

Message

From: Nam, Ed [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A2653F1DDD59470688BA557DD84D9690-NAM, ED]
Sent: 7/17/2018 4:35:35 AM
To: Hoffman, Kathy [KHoffman@sterigenics.com]; Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]
Subject: RE: Flir Camera

Hi Kathy,

Thanks for the quick response. Ok, we will not bring with us and we can discuss further as appropriate.

Thanks

-Ed

From: Hoffman, Kathy [mailto:KHoffman@sterigenics.com]
Sent: Monday, July 16, 2018 10:10 PM
To: Cain, Alexis <cain.alexis@epa.gov>; Nam, Ed <nam.ed@epa.gov>
Subject: Flir Camera

I reviewed the Flir camera in a little more detail on the internet and with our Engineering Department. This seems to be a thermal imaging camera. We are familiar with such cameras and use them periodically to test for hot spots in our electrical equipment at the EO facilities. At this point in time, we do not think they will be beneficial to us for measuring potential EO sources. Let's proceed with our visit and tour this week and we can revisit the topic if you feel differently.

I am looking forward to seeing you on Wednesday at 10am.

Regards,
Kathy

Kathleen Hoffman
Senior Vice President - Global Environmental, Health & Safety and Technical Services
Sterigenics, A Sotera Health Company
2015 Spring Road, Suite 650
Oak Brook, IL 60523
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khoffman@sterigenics.com

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Appointment

From: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]
Sent: 8/2/2018 9:12:01 PM
To: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Hoffman, Kathy [KHoffman@sterigenics.com]; Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]; Sieffert, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dbb22fa4a9b14c1e8c634b2e0791cefa-MSieffer]; Nguyen, Phuong [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f07188263d014e06a28762ccf129ce20-PNguyen]; Nwia, Jacqueline [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d299b56bd7ef46709fb7465fd1e15466-JNwia]; Jeffrey Sprague [Jeff.Sprague@Illinois.gov]; King, Steven [Steven.King@Illinois.gov]; Mattison, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userff092538]
CC: Shappley, Ned [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5fc7fde372054ab5ac38f24b9072b73d-Shappley, N]; Witt, Jon [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ea00bc6f645b438682026a77a8d4267c-Witt, Jonat]; Smith, Darcie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ae3c2377efb42879b943db8796ddc05-Smith, Darcie]; Marcus, Danny [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a34c75d25a6243e68733a8ee7e2ddf82-DMarcus]; Ogulei, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c3e66fb31cd74edb89554389d19d6977-DOgulei]; Armitage, Julie [Julie.Armitage@Illinois.gov]; Wayland, Richard [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d69f0a870909402ebd66847003aa6437-Wayland, Chet]; Shelow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3859abc25e634d418478f3d3ca569c79-Shelow, David]
Subject: EPA/IEPA/Sterigenics Technical Discussion
Location: Personal Privacy / Ex. 6
Start: 8/3/2018 4:00:00 PM
End: 8/3/2018 5:00:00 PM
Show Time As: Busy

This is a call to discuss stack testing, modeling parameters, and ambient monitoring.

PIN: Personal Privacy / Ex. 6

Appointment

From: Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]
Sent: 7/26/2018 10:31:53 PM
To: Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Hoffman, Kathy [KHoffman@sterigenics.com]; Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Siegel, Kathryn [siegel.kathryn@epa.gov]
Subject: EPA Sterigenics update call
Location: conf line: **Personal Privacy / Ex. 6**
Start: 7/27/2018 3:00:00 PM
End: 7/27/2018 3:30:00 PM
Show Time As: Busy

Appointment

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 8/2/2018 9:20:28 PM
To: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group
(FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]

Subject: Accepted: EPA/IEPA/Sterigenics Technical Discussion

Location: Personal Privacy / Ex. 6

Start: 8/3/2018 4:00:00 PM

End: 8/3/2018 5:00:00 PM

Show Time As: Busy

Recurrence: (none)

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Message

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 8/2/2018 9:20:07 PM
To: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]
CC: Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]; Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Sieffert, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dbb22fa4a9b14c1e8c634b2e0791cefa-MSieffer]
Subject: RE: EPA Sterigenics update call

Thanks for setting this up. We have a lot to cover in one call but we may as well get started with the technical discussions.

Regards,
Kathy

From: Cain, Alexis [mailto:cain.alexis@epa.gov]
Sent: Thursday, August 02, 2018 4:17 PM
To: Hoffman, Kathy
Cc: Siegel, Kathryn; Nam, Ed; Sieffert, Margaret
Subject: RE: EPA Sterigenics update call

Thanks! I've sent out an appointment, and included Illinois EPA as well as our HQ experts on stack testing.

Alexis Cain
USEPA-Region 5
(312) 886-7018
cain.alexis@epa.gov

From: Hoffman, Kathy [mailto:KHoffman@sterigenics.com]
Sent: Thursday, August 02, 2018 3:44 PM
To: Cain, Alexis <cain.alexis@epa.gov>
Cc: Siegel, Kathryn <siegel.kathryn@epa.gov>; Nam, Ed <nam.ed@epa.gov>; Sieffert, Margaret <Sieffert.Margaret@epa.gov>
Subject: RE: EPA Sterigenics update call

Yes, we can make it at 11:00am for this call. Ramboll and I can also cover stack testing with the ambient monitoring and modelling. I asked Ramboll to compare the EPA methods for me. I am not sure of their status of this review but I also have some separate feedback from our stack testing consultant.

Regards,
Kathy

From: Cain, Alexis [mailto:cain.alexis@epa.gov]
Sent: Thursday, August 02, 2018 12:29 PM
To: Hoffman, Kathy
Cc: Siegel, Kathryn; Nam, Ed; Sieffert, Margaret
Subject: RE: EPA Sterigenics update call

Is your contractor available late morning? The person with the most knowledge of the ambient monitoring has to leave at noon, so if 11:00 is possible that would work well. If not, we could still have a call tomorrow afternoon, 1:00 say, focusing on modeling and answering as many of the ambient monitoring questions as possible.

Alexis Cain
USEPA-Region 5
(312) 886-7018
cain.alexis@epa.gov

From: Cain, Alexis
Sent: Thursday, August 02, 2018 12:25 PM
To: 'Hoffman, Kathy' <KHoffman@sterigenics.com>
Cc: Siegel, Kathryn <siegel.kathryn@epa.gov>; Nam, Ed <nam.ed@epa.gov>; Sieffert, Margaret <Sieffert.Margaret@epa.gov>
Subject: RE: EPA Sterigenics update call

Thanks Kathy—we'll get back to you soon with a suggested time. Would the topics be ambient monitoring and modeling? If I remember correctly, it's a different contractor for stack testing.

Alexis Cain
USEPA-Region 5
(312) 886-7018
cain.alexis@epa.gov

From: Hoffman, Kathy [<mailto:KHoffman@sterigenics.com>]
Sent: Thursday, August 02, 2018 11:53 AM
To: Cain, Alexis <cain.alexis@epa.gov>
Cc: Siegel, Kathryn <siegel.kathryn@epa.gov>; Nam, Ed <nam.ed@epa.gov>
Subject: RE: EPA Sterigenics update call

Alexis:

Our Ramboll consultant was out on vacation most of this week and returned today. He has some availability tomorrow afternoon until 3:30pm. Would this work for you for some of the technical discussions? If not what are some good time periods for your next week.

Regards,
Kathy

-----Original Appointment-----

From: Nam, Ed [<mailto:nam.ed@epa.gov>]
Sent: Thursday, July 26, 2018 5:32 PM
To: Nam, Ed; Hoffman, Kathy; Cain, Alexis; Siegel, Kathryn
Subject: EPA Sterigenics update call
When: Friday, July 27, 2018 10:00 AM-10:30 AM (UTC-06:00) Central Time (US & Canada).
Where: conf line: call Personal Privacy / Ex. 6

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From: Nam, Ed [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A2653F1DDD59470688BA557DD84D9690-NAM, ED]
Sent: 7/26/2018 10:31:51 PM
To: Hoffman, Kathy [KHoffman@sterigenics.com]; Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]
Subject: EPA Sterigenics update call
Location: **Personal Privacy / Ex. 6**
Start: 7/27/2018 3:00:00 PM
End: 7/27/2018 3:30:00 PM
Show Time As: Tentative

Appointment

From: Cain, Alexis [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0249D52AFE7A491EA6859BF276E694E9-ACAIN]
Sent: 6/25/2018 4:24:23 PM
To: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Hoffman, Kathy [KHoffman@sterigenics.com]; Julie.Armitage@illinois.gov; Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]; Sieffert, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dbb22fa4a9b14c1e8c634b2e0791cefa-MSieffer]; Nguyen, Phuong [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f07188263d014e06a28762ccf129ce20-PNgyuen]; Nwia, Jacqueline [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d299b56bd7ef46709fb7465fd1e15466-JNwia]
CC: Damico, Genevieve [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7d289d99160143fdafef7039dc99807a-GDamico]; Marcus, Danny [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a34c75d25a6243e68733a8ee7e2ddf82-DMarcus]; Furey, Eileen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5aaa3a0ee58047d983897c53c1eb283e-EFurey]; Wagner, Kevin [KWagner@sterigenics.com]; Sprague, Jeff [Jeff.Sprague@Illinois.gov]
BCC: R5Metcalf-ConfRm-R1815B/R5-Metcalf---18th-Floor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userdf592b6b]
Subject: EPA/Sterigenics all on Ethylene Oxide Emissions
Location: R5Metcalf-ConfRm-R1815B/R5-Metcalf---18th-Floor
Start: 6/27/2018 4:00:00 PM
End: 6/27/2018 5:30:00 PM
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Call-in number

Personal Privacy / Ex. 6

- Introductions
- Questions from Sterigenics for EPA about modeling and monitoring
- Timelkine for construction project
- Estimated emissions after construction project
- Potential future monitoring/stack rests
- EPA questions for Sterigenics (modeling parameters-- description and location of emissions points, exit velocities and potential fugitive emissions sources-- we will try to get you some questions tomorrow)
- Future meetings

Message

From: Armitage, Julie [Julie.Armitage@Illinois.gov]
Sent: 8/28/2018 5:59:06 PM
To: Hoffman, Kathy [KHoffman@sterigenics.com]; Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]; Mattison, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userff092538]
Subject: RE: Willowbrook Compliance Test
Attachments: ATT00001.txt

All – we necessarily need an agreed upon date for testing so as to present such information to the public at the meeting tomorrow evening. As to the protocol it is consistent with the terms of the recently issued construction permit and the NESHAP Subpart O. Whether a different methodology is to be used needs to be quickly decided so as to move forward with testing. Also, we need to keep in mind the methods employed in earlier testing. My hope is that we can resolve this issue at our earliest convenience yet today.

From: Hoffman, Kathy [mailto:KHoffman@sterigenics.com]
Sent: Tuesday, August 28, 2018 12:41 PM
To: Nam, Ed <nam.ed@epa.gov>; Cain, Alexis <cain.alexis@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Armitage, Julie <Julie.Armitage@Illinois.gov>; Mattison, Kevin <Kevin.Mattison@Illinois.gov>
Subject: [External] Willowbrook Compliance Test

As requested in the construction permit, we submitted the attached test protocol to Illinois-EPA (Daniel Rowell this morning. We can do the testing as early as September 20 and 21st if you are willing to waive the 30 and 60-day review requirements. I have tentatively scheduled our tester for these dates. Let me know if you are agreeable with them.

If we can agree on the dates, maybe we could inform the Village of Willowbrook too.

Regards,
Kathy

Kathleen Hoffman
Senior Vice President - Global Environmental, Health & Safety and Technical Services
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August 28, 2018

Illinois EPA, Bureau of Air
Compliance & Enforcement Section (MC 40)
Attn: Daniel Rowell, Environmental Engineer
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

RE: Emission System Performance Test Notification
Sterigenics' Willowbrook Facility – ID No. 043110AAC, Permit No. 95120085

Mr. Rowell:

As required in the Construction Permit (Application no. 18060020) issued June 26, 2018, we are submitting this advance notification of our intention to conduct two performance tests of the Sterigenics Willowbrook scrubber control systems at our facilities located at:

Sterigenics - Willowbrook I
7775 South Quincy Street
Willowbrook, IL 60521

Sterigenics – Willowbrook II
830 Midway Drive
Willowbrook, IL 60521

The performance tests are being done pursuant to Section 6 in the construction permit which requires notification at a minimum of 30-days prior to the testing. Sterigenics would be capable of doing the testing prior to the 30-day minimum if this does not interfere with IEPA's ability to observe the testing. The testing can be conducted as early as September 20th for Willowbrook I and September 21st for Willowbrook II. Notification will also be sent a minimum of 5 working days prior to the actual date of testing to confirm actual date/time. Also enclosed is the proposed testing protocol for each performance test.

Please contact me at kwagner@sterigenics.com or at (630) 928-1771 if you have any questions.

Sincerely,

Kevin Wagner
Director, EH&S

**TEST PROTOCOL FOR
AIR POLLUTION SOURCE TESTING
OF AN ETHYLENE OXIDE EMISSION-CONTROL SYSTEM
OPERATED BY STERIGENICS US, LLC.
AT ITS WILLOWBROOK I, ILLINOIS FACILITY**

Submitted to:

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 North Grand Avenue East
Springfield, Illinois 62794**

Submitted by:

**STERIGENICS US, LLC.
7775 South Quincy Street
Willowbrook, Illinois 60521**

I.D. Number 043110AAC

Prepared by:

**ECSI, INC.
PO Box 1498
San Clemente, California 92674-1498**

Prepared on:

August 24, 2018

ECSi

CONTACT SUMMARY

CLIENT

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General Manager
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Willowbrook, Illinois 60521

Phone: (630)654-5151
FAX: (630)325-0020
email: pkrett@sterigenics.com

TEST DATE

September 20-21, 2018

REGULATORY AGENCY

Daniel Rowell
Environmental Protection Engineer III
Bureau of Air – Air Permits Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Phone: (217)558-4368
FAX: (217)524-5023
Email: daniel.rowell@illinois.gov

TESTING CONTRACTOR

Daniel P. Kremer
President
ECSi, Inc.
PO Box 1498
San Clemente, California 92674-1498

Phone: (949)400-9145
FAX: (949)281-2169
email: dankremer@ecsi1.com

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1.0 INTRODUCTION

ECSi, Inc. proposes to conduct air pollution source testing of the ethylene oxide (EtO) emission control system operated by Sterigenics US, LLC. at their Willowbrook I facility, located at 7775 S. Quincy Street. The device to be tested is the two stage AAT Safe Cell packed tower scrubber/dry bed reactor emission-control system, which is used to control emissions from fourteen sterilizer backvents and three aeration rooms. The purpose of the testing program will be to demonstrate compliance with backvent emission control requirements and the conditions established in the Air Quality Permit granted to Sterigenics by the Illinois Environmental Protection Agency (IEPA).

We have specialized exclusively in the performance of ethylene oxide source testing and leak testing since 1992, and are the nationally recognized expert in the field. When the current ethylene oxide emissions regulations were being implemented, we worked closely with the California Air Resources Board (CARB) and USEPA to help develop the currently used testing methodology.

2.0 EQUIPMENT

At Willowbrook I, sterilizer backvent emissions are controlled by:

- One two-stage Advanced Air Technologies Safe Cell emission-control system, comprised of a packed-tower chemical scrubber (SC1), equipped with a packed reaction/interface column, a scrubber fluid recirculation system, and a scrubber fluid reaction/storage tank, and a dry bed reactor/scrubber (SC2), comprised of a bank of solid-bed reaction vessels, connected in parallel, installed downstream of SC1 and upstream of a dedicated blower exhaust system.

3.0 TESTING

EtO source testing will be conducted in accordance with the procedures outlined in USEPA CFR40, Part 63.365, using USEPA Method 18 as specified. EtO emissions monitoring will be conducted simultaneously at the inlet and outlet of the Safe Cell System (the inlet of SC1 and the outlet of SC2) during the entire duration of the backvent phase of one of the fourteen sterilizers. A total of three backvent-phase test runs will be performed.

During the backvent phase, EtO emissions at the inlet and the outlet of the Safe Cell System will be determined using direct source sample injection into a gas chromatograph (GC). All testing will be conducted during normal process load conditions. All backvent testing will be performed with freshly sterilized product in the sterilizer. The testing program will be conducted in accordance with the procedures outlined in the following sections.

4.0 RULE/COMPLIANCE REQUIREMENTS

The EtO gas-sterilization system at the Willowbrook I facility is being tested to demonstrate compliance with EPA requirements, as specified in the IEPA Air Quality Permit. The following requirements must be met:

- The sterilizer backvent phase emissions must be vented to control equipment with an EtO emission-reduction efficiency of at least 99 % by weight.

Testing is required to demonstrate compliance with these requirements. Source testing of the emission-control system is required initially, and may be required periodically thereafter.

5.0 TEST METHOD REFERENCE

5.1 INTRODUCTION

EtO source testing will be conducted in accordance with the procedures outlined in USEPA CFR40, Part 63.365, using USEPA Method 18 as specified. EtO emissions monitoring will be conducted simultaneously at the inlet and outlet of the Safe Cell System during the entire duration of the backvent phase of one of the fourteen sterilizers. A total of three backvent-phase test runs will be performed.

During the backvent phase, EtO emissions at the inlet and the outlet of the Safe Cell System will be determined using direct source sample injection into a gas chromatograph (GC). All testing will be conducted during normal process load conditions. All backvent testing will be performed with freshly sterilized product in the sterilizer. The testing program will be conducted in accordance with the procedures outlined in the following sections.

Operation and documentation of process conditions will be performed by personnel from Sterigenics, Inc. using existing monitoring instruments installed by the manufacturer on the equipment to be tested. In accordance with the procedures established in USEPA CFR40, Part 63, Subpart O, scrubber liquor level will be recorded.

5.2 VOLUMETRIC FLOW MEASUREMENT

Exhaust gas flow at the outlet of SC2 will be determined by 40 CFR 60, Appendix A, Method 2C, using a standard pitot tube and an inclined-oil manometer. Sampling ports will be located in accordance with 40 CFR 60, Appendix A, Method 1. The test ports will be located far enough from any flow disturbances to permit accurate flow measurement.

Temperature measurements will be obtained from a type K thermocouple and thermometer attached to the sampling probe. Exhaust gas composition will be assumed to be >99% ambient air. Water vapor will be negligible and, based on previous test data, a default ambient value of 3 percent will be used for determination of exhaust gas composition and flow calculations.

5.3 CONTROL EFFICIENCY AND MASS EMISSIONS MEASUREMENT

The EtO concentration at the inlet and outlet of the Safe Cell System will be measured simultaneously following the procedures delineated in USEPA CFR40, Part 63.365. During backvent, vented gas will be analyzed by an SRI, Model 8610, portable gas chromatograph (GC), equipped with the following: dual, heated sample loops and injectors; dual columns; and dual detectors. A flame ionization detector (FID) will be used to quantify emissions at the emission-control device inlet, and a photoionization detector (PID) will be used to quantify emissions at the emission-control device outlet.

5.4 SAMPLE TRANSPORT

Source gas will be pumped to the GC at approximately 500-1000 cubic centimeters per minute (cc/min) from the sampling ports through two lengths of Teflon[®] sample line, each with a nominal volume of approximately 75 cubic centimeters (cc) and an outer diameter of 0.25 inch. At the outlet of SC2 the sampling ports will be located in the exhaust stack.

5.5 GC INJECTION

Source-gas samples will then be injected into the GC which will be equipped with two heated sampling loops, each containing a volume of approximately 2cc and maintained at 100 degrees Celsius (C). Injections will occur at approximately one-minute intervals during the sterilization chamber backvent phase. Helium will be the carrier gas for both FID and PID.

5.6 GC CONDITIONS

The packed columns for the GC will both be operated at 85 degrees C. The columns will be stainless steel, 6 feet long, 0.125 inch outer diameter, packed with 1 percent SP-1000 on 60/80 mesh Carbopack B.

Any unused sample gas will be vented from the GC system back to the inlet of the scrubber.

5.7 CALIBRATION STANDARDS

The FID used at the inlet will be calibrated for part-per-million-by-volume (ppmv)-level analyses using gas proportions similar to the following:

- 1) 100 ppmv EtO, balance nitrogen
- 2) 50 ppmv EtO, balance nitrogen (audit gas)
- 3) 10 ppmv EtO, balance nitrogen
- 4) 1 ppmv EtO, balance nitrogen

The PID used at the outlet will be calibrated for ppmv-level analyses using gas proportions similar to the following:

- 1) 100 ppmv EtO, balance nitrogen
- 2) 50 ppmv EtO, balance nitrogen (audit gas)
- 3) 10 ppmv EtO, balance nitrogen
- 4) 1 ppmv EtO, balance nitrogen

Each of these calibration standards will be in a separate, certified manufacturer's cylinder. Copies of the calibration gas laboratory certificates will be included with the final report.

5.8 SAMPLING DURATION

Backvent EtO measurements will be taken for the entire duration of the backvent phase, which will be 15 minutes. This will encompass a total sampling duration of 15 minutes for each backvent phase test run.

5.9 CONTROL-EFFICIENCY/MASS-EMISSIONS CALCULATIONS

Control efficiency of EtO will be calculated for the backvent phase. Control efficiency will be calculated for each data point which will be produced at each injection interval. The time-weighted-average (TWA) EtO control efficiency will be calculated using these results. Results of the control-efficiency testing will be summarized in the final report.

Mass emissions of EtO will be calculated using the following equation:

$$\text{MassRate} = (\text{VolFlow})(\text{MolWt})(\text{ppmv EtO}/10^6)/(\text{MolVol})$$

Where:

MassRate = EtO mass flow rate, pounds per minute

VolFlow = Corrected volumetric flow rate, standard cubic feet per minute at 68 degrees F

MolWt = 44.05 pounds EtO per pound mole
ppmv EtO = EtO concentration, parts per million by volume
 10^6 = Conversion factor, ppmv per "cubic foot per cubic foot"
MolVol = 385.32 cubic feet per pound mole at one atmosphere and 68 degrees F

Mass emissions of EtO will be calculated for backvent. The results will be summarized in the final report.

6.0 TEST SCENARIO

Backvent testing will be performed during normal process load conditions, with freshly sterilized product in the sterilizer. Three test runs will be conducted in series to verify the performance of the emission-control system. The testing schedule will be as follows:

- Equipment setup and gas chromatograph calibration.
- Backvent Test Run #1 is performed with freshly sterilized product in one of the fourteen sterilizers. Sampling is performed at the inlet and outlet of the Safe Cell System.
- Backvent Test Run #2 is performed with freshly sterilized product in one of the fourteen sterilizers. Sampling is performed at the inlet and outlet of the Safe Cell System.
- Backvent Test Run #3 is performed with freshly sterilized product in one of the fourteen sterilizers. Sampling is performed at the inlet and outlet of the Safe Cell System.
- Post-calibration check performed and equipment breakdown.

7.0 QA/QC

7.1 FIELD TESTING QUALITY ASSURANCE

At the beginning of the test, the sampling system will be leak checked at a vacuum of 15 inches of mercury. The sampling system will be considered leak free when the flow indicated by the rotameters falls to zero.

At the beginning of the test, a system blank will be analyzed to ensure that the sampling system is free of EtO. Ambient air will be introduced at the end of the heated sampling line and drawn through the sampling system line to the GC for analysis. The resulting chromatogram also will provide a background level for non-EtO components (i.e. ambient air, carbon dioxide, water vapor) which are present in the source gas stream due to the ambient dilution air which is drawn into the emission-control device. This chromatogram, designated AMB, will be included with the calibration data in the final report.

7.2 CALIBRATION PROCEDURES

The GC system will be calibrated at the beginning and conclusion of each day's testing. Using the Peaksimple II analytical software, a point-to-point calibration curve will be constructed for each detector. A gas cylinder of similar composition as the calibration gases, but certified by a separate supplier, will be used to verify calibration gas composition and GC performance.

All calibration gases and support gases used will be of the highest purity and quality available. A copy of the laboratory certification for each calibration gas will be included in the final report.

8.0 FINAL TEST REPORT DESCRIPTION

The test results will be summarized in a written report. This report will be submitted to the IEPA no later than sixty days after the conclusion of the field testing. It will include results for EtO control efficiency of the emission-control device and mass emissions of EtO to the atmosphere from the emission-control device outlet. The report will contain:

- Summary tables with comparisons of the test results to rule limits;
- Copies of all intermediate data tables and calculation worksheets;
- Copies of all GC chromatograms from calibration runs and sample injections; and
- Laboratory calibration certificates for all calibration and audit gases and all applicable measurement instruments such as pitot tubes and thermocouples.

Message

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 8/24/2018 9:23:49 PM
To: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]
Subject: Automatic reply: Sterigenics call follow-up-- Stack testing and Modeling

I am out of the office on vacation until Monday, August 27th.

If this needs immediate assistance, please contact my assistant Claudine Evans, at cevens@sterigenics.com. This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Message

From: Armitage, Julie [Julie.Armitage@Illinois.gov]
Sent: 8/29/2018 7:21:22 PM
To: Hoffman, Kathy [KHoffman@sterigenics.com]; Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]; Mattison, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userff092538]
Subject: RE: Willowbrook Compliance Test
Attachments: ATT00001.txt

I'm not sure exactly what we can agree to by tonight but I would like to go as far as possible w dates for testing. We'll be in touch yet today.

From: Hoffman, Kathy [mailto:KHoffman@sterigenics.com]
Sent: Wednesday, August 29, 2018 2:19 PM
To: Armitage, Julie <Julie.Armitage@Illinois.gov>; Nam, Ed <nam.ed@epa.gov>; Cain, Alexis <cain.alexis@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Mattison, Kevin <Kevin.Mattison@Illinois.gov>
Subject: [External] RE: Willowbrook Compliance Test

Before tonight's meeting, can we confirm that our proposed testing protocol, which is consistent with all of the past test protocols for the specific emission controls, is acceptable? Can we also agree upon the September 20 and 21st test date?

From: Armitage, Julie [mailto:Julie.Armitage@Illinois.gov]
Sent: Tuesday, August 28, 2018 12:59 PM
To: Hoffman, Kathy; Nam, Ed; Cain, Alexis; Siegel, Kathryn; Mattison, Kevin
Subject: RE: Willowbrook Compliance Test

All – we necessarily need an agreed upon date for testing so as to present such information to the public at the meeting tomorrow evening. As to the protocol it is consistent with the terms of the recently issued construction permit and the NESHAP Subpart O. Whether a different methodology is to be used needs to be quickly decided so as to move forward with testing. Also, we need to keep in mind the methods employed in earlier testing. My hope is that we can resolve this issue at our earliest convenience yet today.

From: Hoffman, Kathy [mailto:KHoffman@sterigenics.com]
Sent: Tuesday, August 28, 2018 12:41 PM
To: Nam, Ed <nam.ed@epa.gov>; Cain, Alexis <cain.alexis@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Armitage, Julie <Julie.Armitage@Illinois.gov>; Mattison, Kevin <Kevin.Mattison@Illinois.gov>
Subject: [External] Willowbrook Compliance Test

As requested in the construction permit, we submitted the attached test protocol to Illinois-EPA (Daniel Rowell this morning. We can do the testing as early as September 20 and 21st if you are willing to waive the 30 and 60-day review requirements. I have tentatively scheduled our tester for these dates. Let me know if you are agreeable with them.

If we can agree on the dates, maybe we could inform the Village of Willowbrook too.

Regards,
Kathy

Kathleen Hoffman

Senior Vice President - Global Environmental, Health & Safety and Technical Services

Sterigenics, A Sotera Health Company

2015 Spring Road, Suite 650

Oak Brook, IL 60523

Office: 630.928.1758

khoffman@sterigenics.com



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Message

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 8/29/2018 7:18:53 PM
To: Armitage, Julie [Julie.Armitage@Illinois.gov]; Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]; Mattison, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userff092538]
Subject: RE: Willowbrook Compliance Test
Attachments: ATT00001.txt

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To: Hoffman, Kathy; Nam, Ed; Cain, Alexis; Siegel, Kathryn; Mattison, Kevin
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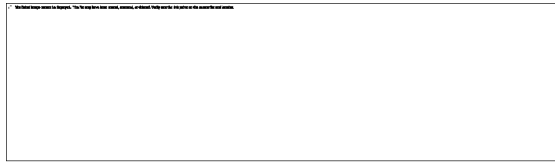
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Sent: Tuesday, August 28, 2018 12:41 PM
To: Nam, Ed <nam.ed@epa.gov>; Cain, Alexis <cain.alexis@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Armitage, Julie <Julie.Armitage@Illinois.gov>; Mattison, Kevin <Kevin.Mattison@Illinois.gov>
Subject: [External] Willowbrook Compliance Test

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If we can agree on the dates, maybe we could inform the Village of Willowbrook too.

Regards,
Kathy

Kathleen Hoffman
Senior Vice President - Global Environmental, Health & Safety and Technical Services
Sterigenics, A Sotera Health Company
2015 Spring Road, Suite 650
Oak Brook, IL 60523
Office: 630.928.1758
khoffman@sterigenics.com



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Message

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 8/19/2018 8:51:39 PM
To: Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]
CC: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]
Subject: EO Monitoring Plan and Report
Attachments: ATT00001.txt

Ed,

Thanks for sending the monitoring plan and report. I wanted to share some comments from our consultant on the report and a related issue.

First, the report would be more informative if it clearly separated concentrations in the industrial park from those of the surrounding community. Those two areas likely have different exposure scenarios, and failure to distinguish them clearly could lead to the mistaken impression that all of the sampling results are relevant to exposures in the community. We suggest separating the results into groups and analyzing each group separately.

Second, as your staff informed us on the phone recently, one of the monitoring stations was on a rooftop; as a result, the samples from that station, taken at about 30 feet above the ground, are not representative of ground-level exposure. Based on the sample map provided, it seems likely that the rooftop station was Station Y, which produced the two highest concentrations. Those concentrations should not be considered in the same group as the other industrial park concentrations.

Finally, we also considered the question of whether there is a background ambient concentration of ethylene oxide that might affect the interpretation of the monitoring results from Willowbrook. Our consultant identified an EPA database that had ambient monitoring results for ethylene oxide from locations in New Hampshire and Rhode Island. I have included a link to that database below, so you can evaluate it, too. Our consultant found detectable concentrations of ethylene oxide in nearly 3,600 of the approximately 13,000 data points. The average ambient concentration in the data set was about 0.29 ug/m3.

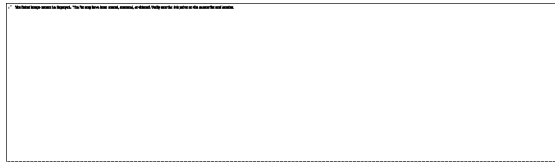
(The database can be found at this link: <https://www3.epa.gov/ttnamti1/toxdat.html#data.>)

We are happy to continue discussing these issues. In the meantime, please let me know if you have any immediate questions.

-- Kathy

Kathleen Hoffman

Senior Vice President - Global Environmental, Health & Safety and Technical Services
Sterigenics, A Sotera Health Company
2015 Spring Road, Suite 650
Oak Brook, IL 60523
Office: 630.928.1758
khoffman@sterigenics.com



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Message

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 8/14/2018 10:17:32 PM
To: Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]
CC: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]
Subject: Re: Check in phone call

That works for me. Talk to you tomorrow.

Sent from my iPhone

On Aug 14, 2018, at 5:10 PM, Nam, Ed <nam.ed@epa.gov> wrote:

Thanks for getting back to us Kathy. We will try to call at 8:30 tomorrow. Will that work? I'm in a meeting from 9-11 or so.

Thanks,
-Ed

From: Hoffman, Kathy [<mailto:KHoffman@sterigenics.com>]
Sent: Tuesday, August 14, 2018 3:54 PM
To: Cain, Alexis <cain.alexis@epa.gov>
Cc: Nam, Ed <nam.ed@epa.gov>
Subject: Re: Check in phone call

Thanks for the email Alexis. I am traveling today but picked up this email. If you want, you can try me on my cell phone at Personal Privacy / Ex. 6

Kathy

Sent from my iPhone

On Aug 14, 2018, at 3:23 PM, Cain, Alexis <cain.alexis@epa.gov> wrote:

Hi Kathy—we were hoping to have a quick check in call with you this afternoon (Ed Nam left you a message). If you can call Ed this afternoon at 312-353-2192 that would be great. If that's not convenient, please let us know some good times to call you later in the week.

Alexis Cain
USEPA-Region 5
(312) 886-7018
cain.alexis@epa.gov

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Message

From: Nam, Ed [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A2653F1DDD59470688BA557DD84D9690-NAM, ED]
Sent: 8/14/2018 9:10:27 PM
To: Hoffman, Kathy [KHoffman@sterigenics.com]; Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]
Subject: RE: Check in phone call

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Thanks,
-Ed

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Sent: Tuesday, August 14, 2018 3:54 PM
To: Cain, Alexis <cain.alexis@epa.gov>
Cc: Nam, Ed <nam.ed@epa.gov>
Subject: Re: Check in phone call

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Kathy

Sent from my iPhone

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(312) 886-7018
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Message

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 6/22/2018 4:59:45 PM
To: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]
CC: Nguyen, Phuong [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f07188263d014e06a28762ccf129ce20-PNguyen]; Sieffert, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dbb22fa4a9b14c1e8c634b2e0791cefa-MSieffer]
Subject: RE: Modeling files
Attachments: ATT00001.txt

Alexis:

Thank you very much for providing these input and output files. We will begin our review of them.

If you have any further questions on this matter or our proposed project, please feel free to contact me.

Regards,
Kathy

Kathleen Hoffman

Senior Vice President - Global Environmental, Health & Safety and Technical Services
Sterigenics, A Sotera Health Company
2015 Spring Road, Suite 650
Oak Brook, IL 60523
Office: 630.928.1758
khoffman@sterigenics.com



From: Cain, Alexis [mailto:cain.alexis@epa.gov]
Sent: Friday, June 22, 2018 9:12 AM
To: Hoffman, Kathy
Cc: Nguyen, Phuong; Sieffert, Margaret
Subject: Modeling files

Kathy—here are our modeling input/output files.

Alexis Cain
USEPA-Region 5
(312) 886-7018
cain.alexis@epa.gov

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Message

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 8/9/2018 8:34:01 PM
To: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]
Subject: RE: Sterigenics call follow-up

Thanks Alexis. I forwarded this to Ramboll and am checking on the status of the EO background data reports.

Kathy

From: Cain, Alexis [mailto:cain.alexis@epa.gov]
Sent: Thursday, August 09, 2018 1:14 PM
To: Hoffman, Kathy
Cc: Nam, Ed; Siegel, Kathryn; Sieffert, Margaret; Nguyen, Phuong; Nwia, Jacqueline; Sprague, Jeff; King, Steven; Mattison, Kevin; Shappley, Ned; Witt, Jon; Smith, Darcie; Marcus, Danny; Ogulei, David; Armitage, Julie; Wayland, Richard; Shelow, David
Subject: RE: Sterigenics call follow-up

Hi Kathy—

Attached are the sampling plan, met data, lab reports, and calibration curves. There are a few redactions, related to pre-decisional EPA materials. We still owe you some information about method 320, which should be coming soon.

We received the information you sent about the stack parameters and building dimensions. Thank you.

I hope we can schedule a time to follow-up next week.

Thanks
Alexis

From: Nam, Ed
Sent: Friday, August 03, 2018 4:52 PM
To: Hoffman, Kathy <KHoffman@sterigenics.com>
Cc: Siegel, Kathryn <siegel.kathryn@epa.gov>; Sieffert, Margaret <Sieffert.Margaret@epa.gov>; Cain, Alexis <cain.alexis@epa.gov>
Subject: Sterigenics call follow-up

Hi Kathy—

Thanks to you and your team for another very productive conference call. I'm pleased that we were able to get through these technical issues, with just a few follow-ups needs. Here is our understanding of what those follow-ups are:

EPA will provide to Sterigenics:

- Information about method 320, including a list of companies able to perform the test and an explanation of why we are recommending this method.
- EPA's sampling plan used during the canister sampling in Willowbrook, the lab reports and calibration curves (if possible), and the met data.

Sterigenics will:

- Provide requested stack parameters and building dimensions for modeling.
- Provide a link to information about long-term EtO monitoring in New England.

- Review information about potential use of an IR camera for leak detection.

We will have a follow-up call the week after next. I suggest 9:00 or 10:00am on either Thursday, August 16 or Friday, August 17.

Thanks again.

-Ed

-Edward Nam, PhD
Director, Air and Radiation Division
US EPA, Region 5, Mail code A-18J
77 W. Jackson Blvd.
Chicago, IL 60604-3590
Phone 312-353-2192 nam.ed@epa.gov

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Message

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 7/11/2018 6:36:26 PM
To: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]
CC: Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]; Sieffert, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dbb22fa4a9b14c1e8c634b2e0791cefa-MSieffer]; Julie.Armitage@illinois.gov; Jeffrey Sprague [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user55ef07a3]; King, Steven [Steven.King@Illinois.gov]; Mattison, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userff092538]
Subject: RE: Sterigenics - Met data & Plot files

Excellent. We will be set for you then. We do not plan to have any attorneys at this meeting.

For safety equipment, I would suggest steel-toed shoes. We will have safety vests and safety glasses for you.

Let me know how many as the time gets closer.

Kathy

From: Cain, Alexis [mailto:cain.alexis@epa.gov]
Sent: Monday, July 09, 2018 11:03 AM
To: Hoffman, Kathy
Cc: Nam, Ed; Siegel, Kathryn; Sieffert, Margaret; Julie.Armitage@illinois.gov; Jeffrey Sprague; King, Steven; Mattison, Kevin
Subject: RE: Sterigenics - Met data & Plot files

Kathy—that sounds great. Thanks. How about 10:00am on July 18?

Closer to the date, we will provide a list of who's coming. I assume that this will be a "no-lawyers" meeting?

Also—please let us know if we should bring any safety equipment with us.

Alexis Cain
USEPA-Region 5
(312) 886-7018
cain.alexis@epa.gov

From: Hoffman, Kathy [mailto:KHoffman@sterigenics.com]
Sent: Friday, July 06, 2018 10:22 AM
To: Cain, Alexis <cain.alexis@epa.gov>
Cc: Nam, Ed <nam.ed@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Sieffert, Margaret <Sieffert.Margaret@epa.gov>; Julie.Armitage@illinois.gov; Jeffrey Sprague <Jeff.Sprague@Illinois.gov>; King, Steven <Steven.King@Illinois.gov>; Mattison, Kevin <Kevin.Mattison@Illinois.gov>
Subject: RE: Sterigenics - Met data & Plot files

Alexis:

July 18th still works for us and the Willowbrook facility. Let me know what timing works for you. I will prepare some slides with detailed process description and emission information. We can go through this before we tour the facility. I am looking forward to meeting everyone and further these discussions.

Regards,
Kathy

From: Cain, Alexis [<mailto:cain.alexis@epa.gov>]
Sent: Thursday, July 05, 2018 10:39 AM
To: Hoffman, Kathy
Cc: Nam, Ed; Siegel, Kathryn; Sieffert, Margaret; Julie.Armitage@illinois.gov; Jeffrey Sprague
Subject: RE: Sterigenics - Met data & Plot files

Hi Kathy—I hope you had great Independence Day holiday!

July 18 works best for us for a visit to Willowbrook. If that still works for you, please let us know the best time for us to arrive.

Thanks!

Alexis Cain
USEPA-Region 5
(312) 886-7018
cain.alexis@epa.gov

From: Hoffman, Kathy [<mailto:KHoffman@sterigenics.com>]
Sent: Friday, June 29, 2018 4:25 PM
To: Cain, Alexis <cain.alexis@epa.gov>
Subject: RE: Sterigenics - Met data & Plot files

Alexis:

Thank you very much for this data. I have forwarded it to our Ramboll consultants for further review. I have been conducting a training seminar this week and this is my first day in the office catching up on emails.

As for dates of where you might come out to Willowbrook, I am on vacation next week and in Cleveland most of the following week for corporate meetings. Could we schedule something the week of July 16th or 23rd? The facility is available these weeks except they have all-day customer audits on Thursday, July 19th and Wednesday, July 25th. I would like to prepare a more detailed description of our operations and emissions and then tour the facility. If needed, I could have someone from Engineering present and they can show the status of the backvent project too. We should be quite a bit into the project by then.

As mentioned, I am out of the office next week but will be checking emails.

Regards,
Kathy

From: Cain, Alexis [<mailto:cain.alexis@epa.gov>]
Sent: Wednesday, June 27, 2018 4:13 PM
To: Hoffman, Kathy
Subject: Sterigenics - Met data & Plot files

Hello Kathleen—we're very pleased to be working cooperatively with you to address ethylene oxide issues; thank you for that.

I've attached a file with the five-year meteorological data used for the modeling, the plot files for the period (five-year) average, 1-hr average, and 8- hr average, as well as the met data collected during our three-day sampling period.

Could you suggest some days when we might come out to Willowbrook for a presentation and tour? It would be great to connect voices to faces, as well as to see your operations.

Alexis Cain

USEPA-Region 5

(312) 886-7018

cain.alexis@epa.gov

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Message

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 7/9/2018 7:47:01 PM
To: Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]
CC: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]; Armitage, Julie [Julie.Armitage@Illinois.gov]; Rountree, Jillian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7d304e5e55a54908b24b17e57ecdbf3c-JRountree]; Wagner, Kevin [KWagner@sterigenics.com]
Subject: RE: June 27 EPA/IEPA/Sterigenics meeting
Attachments: ATT00001.txt

I promised weekly updates on the Sterigenics Willowbrook Backvent Project. I was on vacation last week.

Following is a synopsis of the current project and status as of this morning:

- Design efforts completed for both WB1 & WB2.
- Received VFDs for WB 1 blowers. None required for WB2.
- Finalized mechanical scope with contractor for WB1 and WB2.
- Mechanical contractor awaiting materials for WB1 efforts.
- Controls Engineer on site this week to support efforts for WB1 and WB2.
- Completion Status – WB1 and 2 combined
 - Design: 100%
 - Installation: 5%

We have scheduled our next meeting for July 18th at the facility. I will provide a summary of the entire sterilization process and emissions as well as providing a tour of our Willowbrook facility.

Kathy

From: Hoffman, Kathy
Sent: Thursday, June 28, 2018 11:58 AM
To: 'Nam, Ed'
Cc: Cain, Alexis; Siegel, Kathryn; Armitage, Julie; Rountree, Jillian; Wagner, Kevin
Subject: RE: June 27 EPA/IEPA/Sterigenics meeting

Ed:

Thank you for coordinating the call and the follow-up notes.

Attached is a summary of the Willowbrook emissions before and after the backvent connection project that we discussed. The top part of the spreadsheet estimates the maximum potential to emit, using permitted usage amounts and required control efficiencies. The bottom part of the spreadsheet estimates the actual emissions, using current 2017 usage amounts and the control efficiencies from the last compliance test. Both portions of the spreadsheet include our process emissions as well as an estimate of the fugitive emissions.

In addition, I wanted to reiterate our projected timeline for the backvent connection construction project. As indicated during the call yesterday, we estimate that this project will take from 4 to 6 weeks from yesterday. I will provide weekly updates to you on this project.

We are working on the other commitments we agreed to during the meeting.

Let me know if you have any questions on the information provided.

Regards,
Kathy

Kathleen Hoffman

Senior Vice President - Global Environmental, Health & Safety and Technical Services
Sterigenics, A Sotera Health Company
2015 Spring Road, Suite 650
Oak Brook, IL 60523
Office: 630.928.1758
khoffman@sterigenics.com

From: Nam, Ed [mailto:nam.ed@epa.gov]
Sent: Thursday, June 28, 2018 10:09 AM
To: Hoffman, Kathy
Cc: Cain, Alexis; Siegel, Kathryn; Armitage, Julie; Rountree, Jillian
Subject: June 27 EPA/IEPA/Sterigenics meeting

Kathy,

Thank you again for your participation in a first, very productive conference call. We look forward to future meetings, including a presentation and a tour of the Willowbrook facility.

Here is our understanding of the commitments that we made on the call to provide information to you:

- The met data collected during our monitoring efforts in May 2018
- The met data used in the modeling
- The modeling plot files

Alexis Cain provided these in a separate email. Please let me know if there are remaining questions we can address.

Here is our understanding of the commitments that you made to provide information to us:

- Emissions calculations, including fugitive emissions (before and after construction)
- A review of the modeling parameters we used
- A review of the proposed OAQPS monitoring plan
- A description of operations, process flow, cycle times, facility map
- A timeline for the construction project, when available.

My staff will be in contact about scheduling a next meeting and tour.

Thank you,
-Ed

-Edward Nam, PhD
Director, Air and Radiation Division
US EPA, Region 5, Mail code A-18J
77 W. Jackson Blvd.
Chicago, IL 60604-3590
Phone 312-353-2192 nam.ed@epa.gov

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Message

From: Mattison, Kevin [Kevin.Mattison@Illinois.gov]
Sent: 7/5/2018 3:45:30 PM
To: Armitage, Julie [Julie.Armitage@Illinois.gov]; Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Hoffman, Kathy [KHoffman@sterigenics.com]
CC: Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]; Sieffert, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dbb22fa4a9b14c1e8c634b2e0791cefa-MSieffer]; Jeffrey Sprague [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user55ef07a3]; King, Steven [Steven.King@Illinois.gov]
Subject: RE: Sterigenics - Met data & Plot files

I'm available the entire day.
Kevin

From: Armitage, Julie
Sent: Thursday, July 05, 2018 10:44 AM
To: Cain, Alexis <cain.alexis@epa.gov>; Hoffman, Kathy <KHoffman@sterigenics.com>
Cc: Nam, Ed <nam.ed@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Sieffert, Margaret <Sieffert.Margaret@epa.gov>; Sprague, Jeff <Jeff.Sprague@Illinois.gov>; King, Steven <Steven.King@Illinois.gov>; Mattison, Kevin <Kevin.Mattison@Illinois.gov>
Subject: RE: Sterigenics - Met data & Plot files

I was just preparing to email you. Steve King and Kevin Mattison will be joining you. I believe they are both flexible on time. I'll let you sort out those details with them. I've copied them both.

From: Cain, Alexis [<mailto:cain.alexis@epa.gov>]
Sent: Thursday, July 05, 2018 10:39 AM
To: Hoffman, Kathy <KHoffman@sterigenics.com>
Cc: Nam, Ed <nam.ed@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Sieffert, Margaret <Sieffert.Margaret@epa.gov>; Armitage, Julie <Julie.Armitage@Illinois.gov>; Sprague, Jeff <Jeff.Sprague@Illinois.gov>
Subject: [External] RE: Sterigenics - Met data & Plot files

Hi Kathy—I hope you had great Independence Day holiday!

July 18 works best for us for a visit to Willowbrook. If that still works for you, please let us know the best time for us to arrive.

Thanks!

Alexis Cain
USEPA-Region 5
(312) 886-7018
cain.alexis@epa.gov

From: Hoffman, Kathy [<mailto:KHoffman@sterigenics.com>]
Sent: Friday, June 29, 2018 4:25 PM

To: Cain, Alexis <cain.alexis@epa.gov>

Subject: RE: Sterigenics - Met data & Plot files

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Kathy

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Sent: Wednesday, June 27, 2018 4:13 PM

To: Hoffman, Kathy

Subject: Sterigenics - Met data & Plot files

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Message

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 7/18/2018 11:41:30 PM
To: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]; Sieffert, Margaret [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dbb22fa4a9b14c1e8c634b2e0791cefa-MSieffer]; Nguyen, Phuong [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f07188263d014e06a28762ccf129ce20-PNguyen]; King, Steven [Steven.King@Illinois.gov]; Mattison, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userff092538]; Ogulei, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c3e66fb31cd74edb89554389d19d6977-DOgulei]
Subject: Today's Presentation
Attachments: ATT00001.txt; 18.07.18 - USEPA Process Overview Presentation.pptx

It was nice meeting with all of you today at our Willowbrook facility. As promised during today's meeting, attached is my presentation. I hope this discussion and tour was helpful in better understanding our EO sterilization process and emissions. I look forward to continuing to work with you on this issue.

Let me know if you have any further questions.

Regards,
Kathy

Kathleen Hoffman

Senior Vice President - Global Environmental, Health & Safety and Technical Services
Sterigenics, A Sotera Health Company
2015 Spring Road, Suite 650
Oak Brook, IL 60523
Office: 630.928.1758
khoffman@sterigenics.com



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Review of EO Sterilization Process

KATHLEEN HOFFMAN



JULY 2018

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****Note – Historically your typical presentation has followed an outline similar to the below (S=standard, C=custom updated by presenter for current events).**

We have therefore organized these slides with this outline in mind. We have also included Recent Activities and Current Projects blank/placeholder slides for you to customize, as needed.

- S- Introduction to Sotera Health
- S- The Sotera Health Advantage
- S- Sterigenics Capabilities
- S- Sterigenics Locations
- C- Recent Activities (press releases etc)
- C- Current Projects (relevant to the customer)
- S- Why choose Sterigenics (Summary)

0

Overview

- Sterigenics – Company Background
- EO Sterilization Process
- Other EO Controls and Monitoring
- EO Emissions and Emission Controls
- Willowbrook Backvent Project
- Tour and Next Steps



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1

Leading Portfolio of Differentiated Services and Products



Safeguarding Global Health™



A Sotera Health company

Expert Lab Testing and Consulting

- ※ Provider of microbiology and biopharma testing services
 - ... State-of-the-art facilities across 11 global lab locations
- ※ Offers 400+ tests across the product lifecycle, from initial product validation to ongoing quality control and extractables and leachables testing
- ※ End markets include Medical Devices, Pharma and Tissue
- ※ 2,300+ active customers including leading medical device and pharma manufacturers
- ※ Acquired Toxikon EU in 4Q17 to further expand lab services in Pharma

Safeguarding Global Health – with every test we complete.



A Sotera Health company

Gamma Technologies (GT)

- ※ Global leader in Cobalt-60 ("Co-60") supply
 - ... Co-60 is the key input for Gamma sterilization
 - ... Established market leader
- ※ Exclusive long-term Co-60 supply contracts with nuclear reactors at multiple reactor sites
- ※ 40 active customers including contract sterilizers and medical device OEMs, served via multi-year agreements

Medical Isotopes (MI)

- ※ Leading global supplier of critical medical isotopes for research, diagnostic and therapeutic uses
- ※ Manufactures various medical isotopes for the nuclear medicine industry
- ※ Supply relationships with fission and cyclotron-based research reactors
- ※ Customers include hospitals and radiopharmacies, served via multi-year contracts

Safeguarding Global Health – with every critical isotope we supply.



A Sotera Health company

Comprehensive Sterilization Services

- ※ Provider of mission-critical and government mandated sterilization services
 - ... 46 facilities in 13 countries
- ※ Offers all major sterilization technologies: Gamma Irradiation ("Gamma"), Ethylene Oxide ("EO") & Electron Beam ("E-Beam")
- ※ End markets include Medical Devices, Pharma, and Food
- ※ 2,800+ customers in 52 countries including virtually all leading medical device OEMs, served via multi-year contracts
- ※ #1 or #2 market position in all modalities

Safeguarding Global Health – with every product we sterilize.



A Sotera Health company

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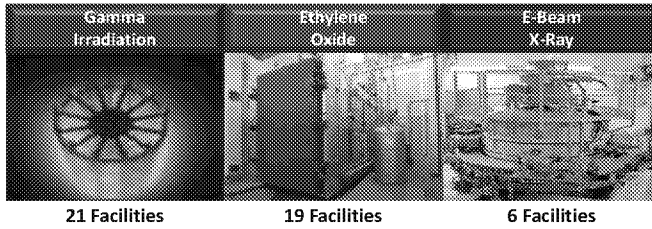
2

Fill Sterigenics box

2

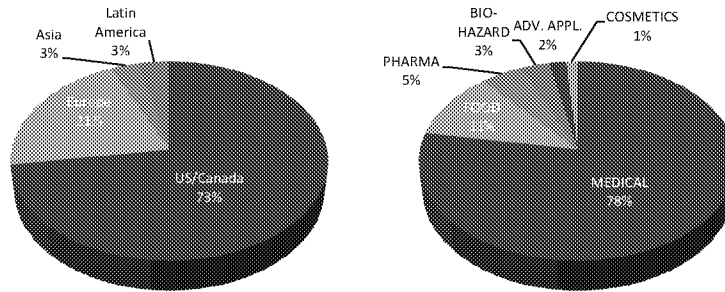
Sterigenics at a Glance

Sterigenics provides outsourced sterilization and decontamination services to safeguard patients, consumers, and our customers brand



Through 46 facilities in 13 countries we offer cycle design, process validation, sterilization, decontamination, materials modification, and phytosanitary applications

The service we provide makes the products of our customers safe for their intended use, and in many cases is required by local regulatory bodies



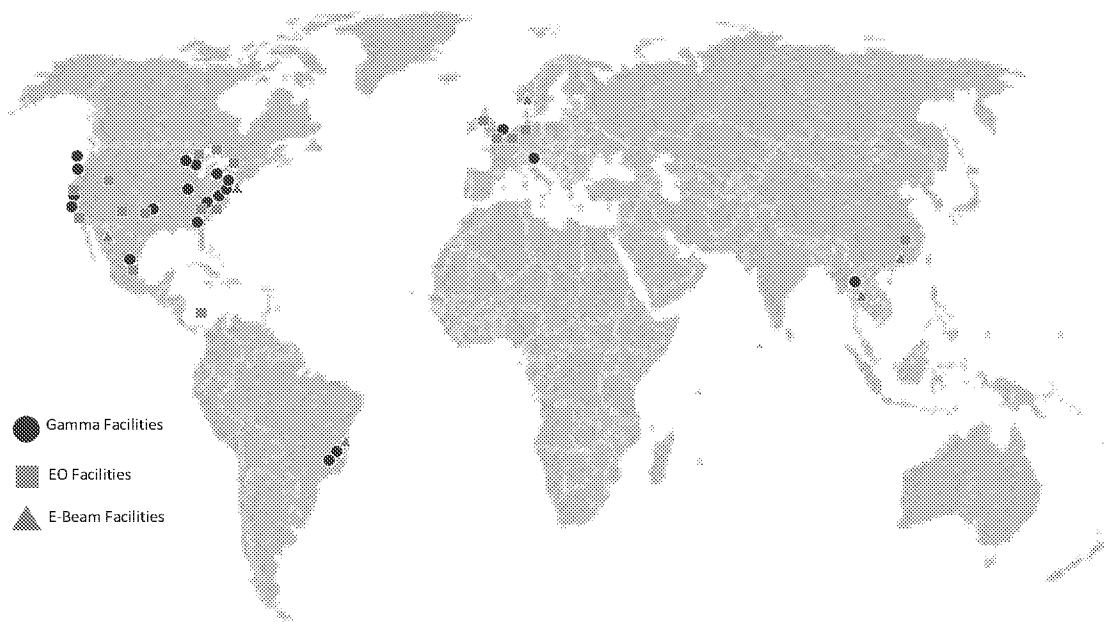
Sterigenics
A Sealed Air Company
1. Based on FY 2017 Sales

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3

We Provide a Worldwide Network of Facilities to Support Global Customers...

This requires us to comply with multiple to agencies in multiple countries



To accomplish this we operate globally to the toughest standards in each category



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We operate as a matrix organization to ensure global consistency.

EH&S

- Set corporate global compliance standards, provide training, and audit facilities for compliance.
- EH&S Management system is compliant to OHSAS 18001 and ISO 14001 standards.

Quality

- Administer global quality system, global quality report and follow up on CAPA program, audit facilities for compliance

Engineering

- Design and control of facilities installation, set up of audit of maintenance processes and procedures.

Sales

- Account relationship management, acquisition of new business, balance of capacity across facilities.

Facilities

- Execute corporate processes and policies to deliver service to customer in compliance with all regulatory requirements

Support (HR, Fin, IT, Legal)

- Provide administrative support to all facilities

Products and Customers at Willowbrook

- Sterigenics processes a large variety of products at the Willowbrook facility using ethylene oxide (EO).
- The most common products processed in Willowbrook are medical equipment and supplies, pharmaceuticals, and food/spice products.
- Some specific medical products processed at the Willowbrook facility include catheters, surgery kits, knee implants, staplers, and tracheal tubes.
- Many of these products can only be sterilized with EO.



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Why Ethylene Oxide (EO) is Needed

- Many heat-sensitive medical products can only be processed with EO sterilization and cannot be processed with radiation and other methods. Such products typically contain plastic components that are radiation-sensitive.
- About 55% of medical products and about 95% of surgery kits are processed with EO sterilization.
- EO sterilization is vital to the healthcare industry.

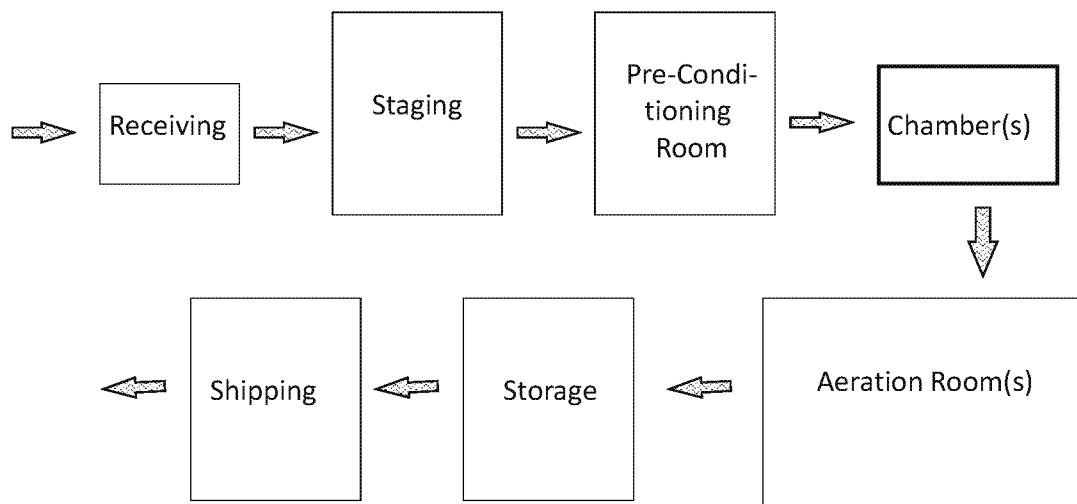


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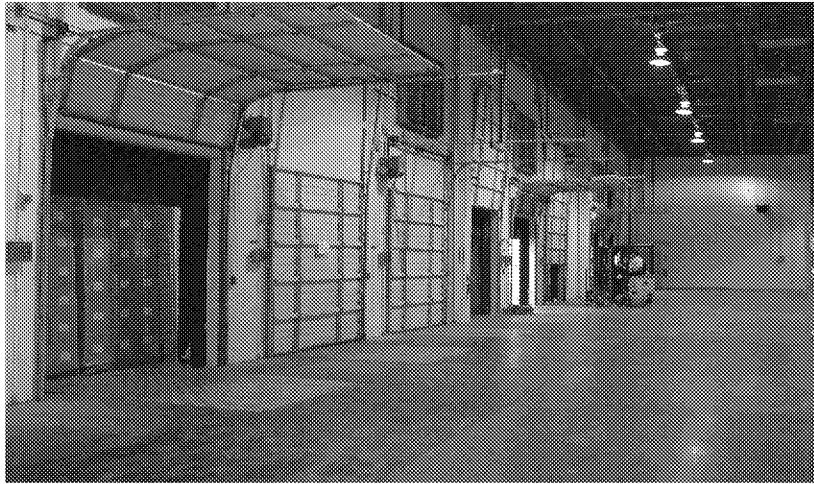
EO Sterilization Process

Product Flow Diagram



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Receiving Docks



Product is received at receiving docks where the trucks contents are unloaded and placed in the Receiving storage area.

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Receiving Docks

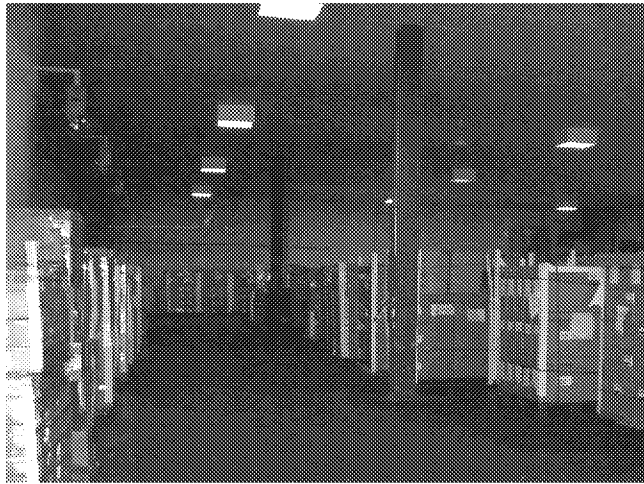
Product is received on pallets and is traced throughout the process.



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Pre-Conditioning



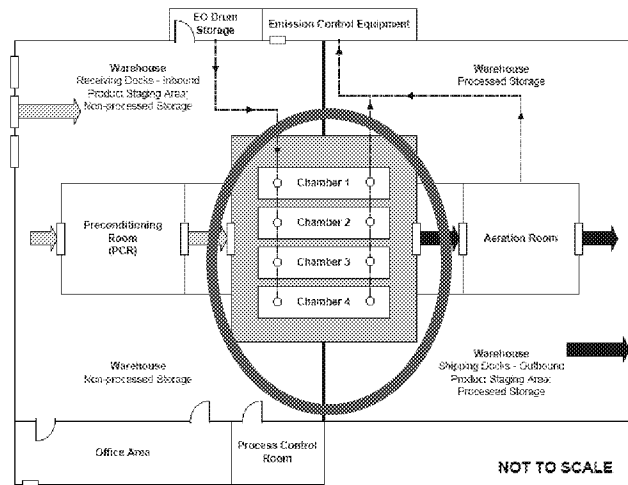
Product is stored in Preconditioning rooms at elevated temperature and humidity for a prescribed amount of time.

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Sterilization Chambers

Following Preconditioning, the material is ready to be sterilized and moved to an EO Sterilization Chamber.



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Sterilization Chambers

Chambers are large, gas-tight, steel containers that are capable of holding vacuums.

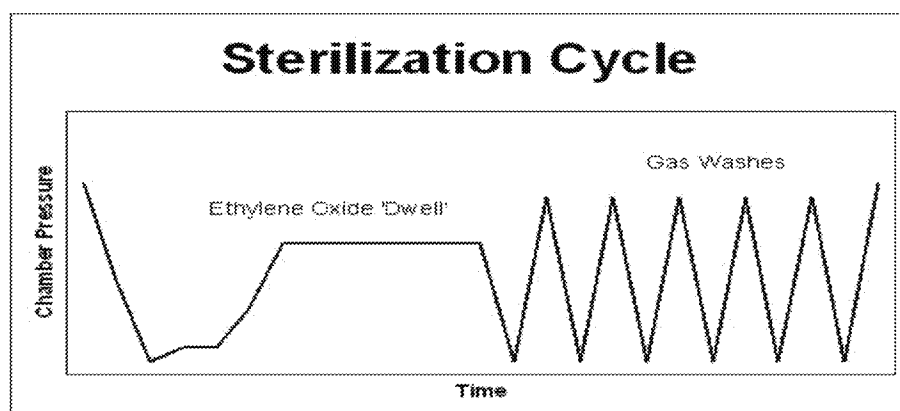


Steam or hot water is circulated through a jacket around the chamber to regulate the temperature of the material inside.

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EO Gas Cycle Designs

EO is exposed to product inside of a Chamber through a process controlled and FDA-validated 'Cycle'. A Cycle is composed of several steps, including removal of air, injection of steam, nitrogen and EO, and then removal of the EO. The EO removal is conducted through a series of 'gas washes'.



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Aeration

Product is removed from chambers and placed in an Aeration Room or Cell.



Aeration rooms/cells allow the product to safely aerate. The aeration area is at an elevated temperature, where the EO is captured and sent to an emissions control device.

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Processed Product



Processed product is stored in the processed storage area until the product is picked up by the customers.

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Shipping

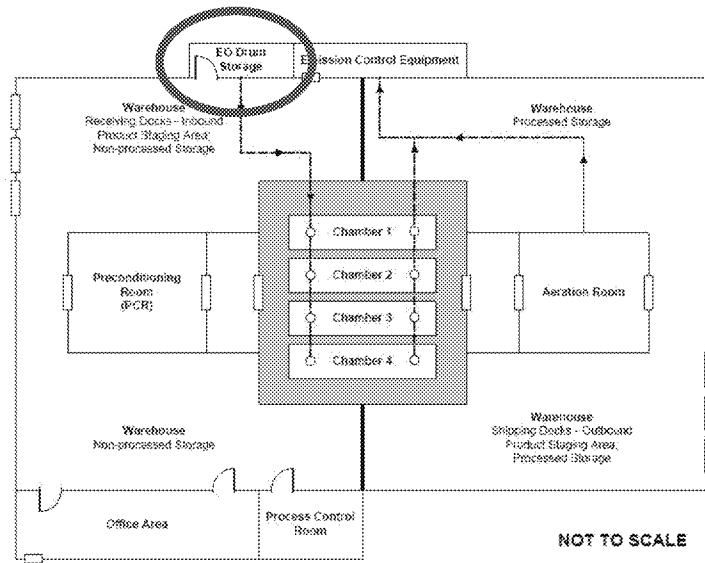


From aeration or processed storage, processed product is loaded back onto customer's trucks and returned to them for distribution.

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EO Drum Storage



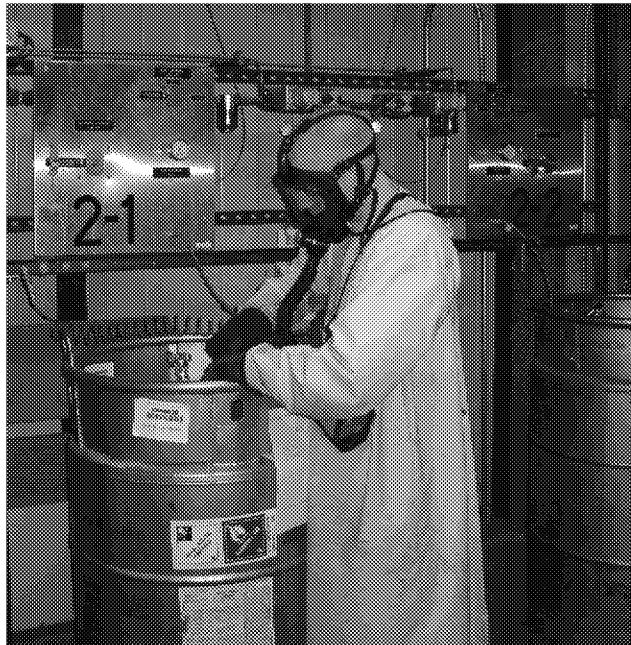
Ethylene Oxide is stored in a special drum storage area.

Access to this area is restricted.

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EO Drum Use and Storage



Special precautions are taken when EO drums are connected and disconnected.

All connections and piping are gas-tight and leak-checked.

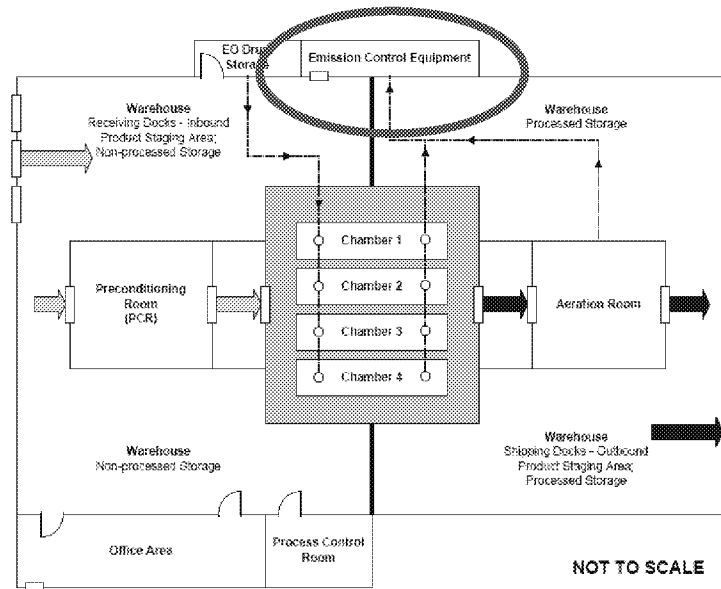
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Emission Controls

EO emissions
must be
controlled.

EO vapors are
piped from the
Chambers and
Aeration rooms
to Emissions
Control
Equipment.



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The EO Process is heavily regulated

- **Environmental (EPA) Regulations:**

- NESHAP Regulation for Ethylene Oxide
- Risk Management Program

- **Safety (OSHA) Regulations:**

- EO Standard
- Process Safety Management

- **Other Regulations:**

- DOT regulations for shipment of hazardous wastes and EO Drum Design
- Homeland Security
- NFPA Requirements for the EO Process Equipment and Area

- **FDA and ISO Requirements:**

- ISO/AAMI Standard 11135 regulates the EO sterilization Process
- ISO/AAMI Standard 10993 regulates the EO residual in healthcare products

Controls in place to prevent EO leaks and exposure

▪ EO Drum Handling:

- ✓ Leak Tests
- ✓ EO Monitoring Systems (PPM and LEL)
- ✓ Nitrogen Overpressure System

▪ EO Chambers and Chamber Room:

- ✓ EO Monitoring Systems (PPM and LEL)
- ✓ Backvents on all chambers
- ✓ VAPORS and Door Interlock Systems
- ✓ Emission Control Systems
- ✓ Unloading Warning Light System

▪ Aeration Rooms:

- ✓ Emission Control Systems
- ✓ Rooms under Negative Pressure
- ✓ Segregation & Respirator Requirements

▪ Other Areas:

- ✓ EO Regulated Areas & Segregation
- ✓ Positive Pressure in Control Room



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▪ LEL Detection Systems:

- ✓ Lower Explosive Limit (LEL) Detectors with 10% Alarms – strategically located

▪ PPM Detection Systems (with lights):

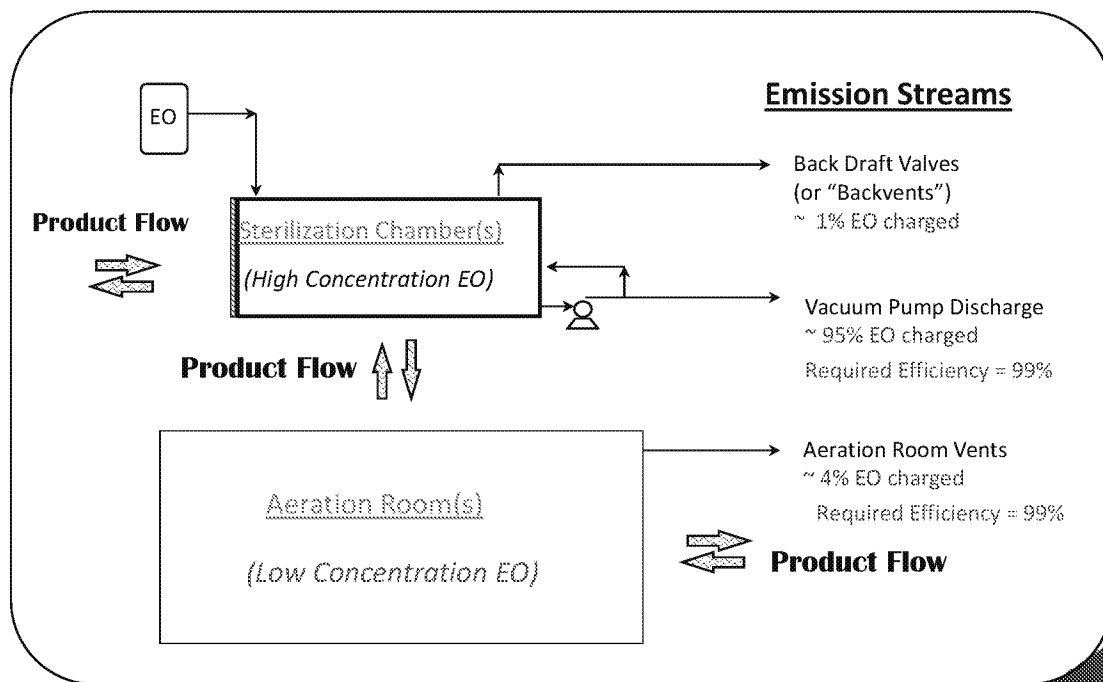
- ✓ Multi-port GC monitoring system that measures EO ppm levels in several facility areas.
- ✓ EO Warning Lights linked to the monitoring system

▪ Portable LEL and PPM Detectors

▪ Employee Badge Monitoring:

- ✓ Quarterly badge testing for all employees

EO Sterilization Emissions

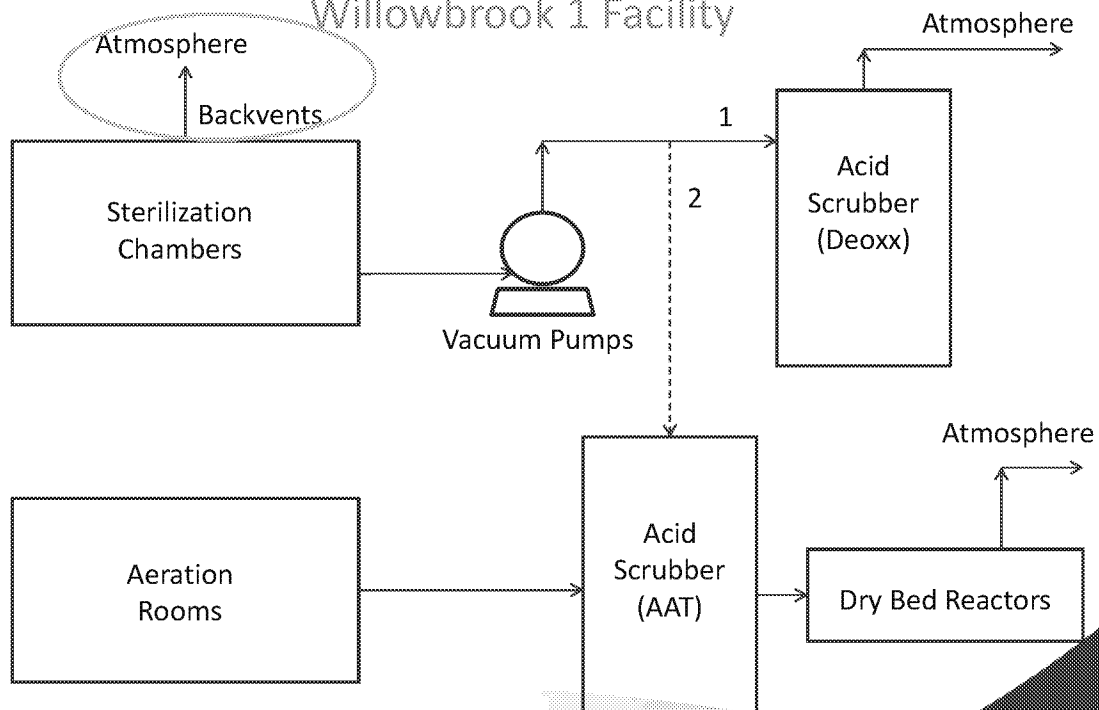


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Current EO Emissions Control Systems

Willowbrook 1 Facility



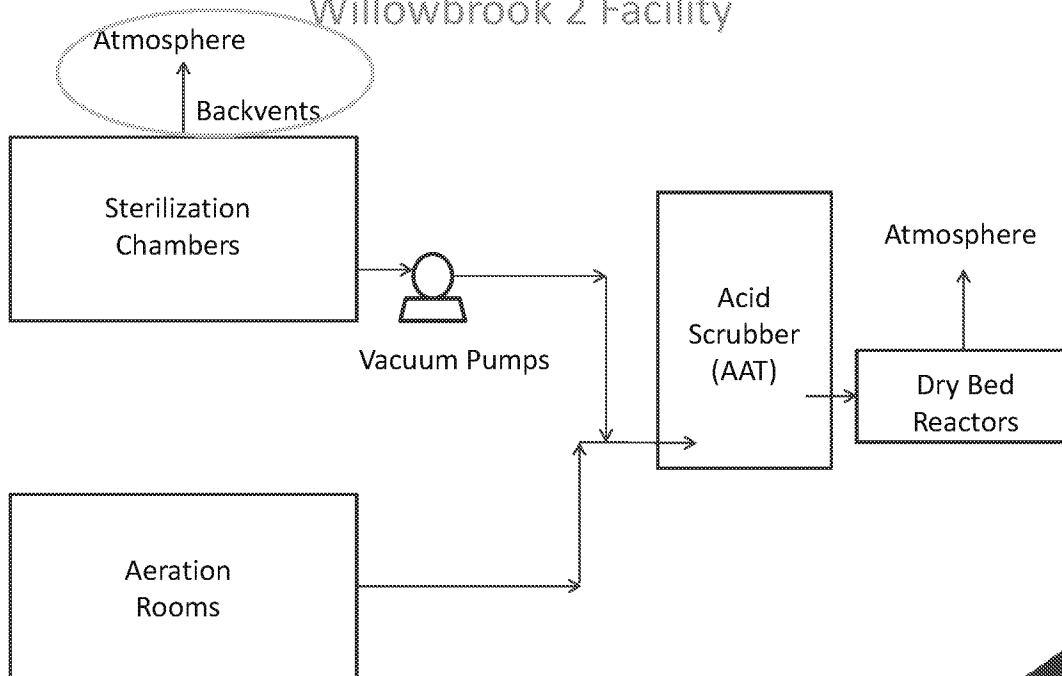
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Chamber Emissions may be directed to Deox (1) or AAT (2)

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Current EO Emissions Control Systems

Willowbrook 2 Facility



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Backvent Project - Description

- ♦ Backvent project will connect the sterilization chamber backvents to the emission controls used for aeration emissions at both WB1 and WB2 facilities
- ♦ It will also install a queuing system that controls the maximum number of backvents that can be open at one time.
- ♦ This project will have a significant reduction of EO emissions at the Willowbrook facilities.
- ♦ Project Status:
 - All equipment is received and being installed. The queuing system is scheduled to be installed on Tuesday.
 - Testing protocols will need to be completed.
 - Contractors: 75-80%
 - Overall Completion: 50%
- ♦ The project is scheduled to be complete by Friday, July 27.



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Backvent Project – Emission Reductions

Maximum Permitted Usage

		WB I	WB II	WB I & II
Ethylene Oxide Permitted Usage:	lbs/yr	840000	244200	1084200
Propylene Oxide Permitted Usage:	lbs/yr	33600		33600
Total HAP and VOM Usage:	lbs/yr	873600	244200	1117800

Current Potential to Emit Calculation

Proposed Potential to Emit Calculation

Potential to Emit Emissions

		HAP Uncontrolled Emissions lb/yr	Currently Required Control Efficiency	HAP Controlled Emissions lb/yr	Proposed Required Control Efficiency	HAP Controlled Emissions lb/yr	% Change
WB1	Sterilizer Vacuum Pump Emissions (95%)	829920	99.00%	8299	99.0%	8299	
	Aeration Emissions (4%)	34944	99.00%	349	99.0%	349	
	Sterilizer Back Vent Emissions (1%)	8736	0	8736	99.0%	87	
	Fugitives (0.05% est.)		0	420	0	420	
WB 2	Sterilizer Vacuum Pump Emissions (95%)	231990	99.00%	2320	99.0%	2320	
	Aeration Emissions (4%)	9768	99.00%	98	99.0%	98	
	Sterilizer Back Vent Emissions (1%)	2442	0	2442	99.0%	24	
	Fugitives (0.05% est.)		0	122	0	122	
	Total Process Emissions:			22244		11178	50%
	Total Emissions:			22786		11720	49%

Actual Usage (2017)

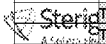
		WB I	WB II	WB I & II
Ethylene Oxide Usage:	lbs/yr	284,077	139,635	423712
Propylene Oxide Usage:	lbs/yr	0	0	0
Total HAP and VOM Usage:	lbs/yr	284077	139635	423712

Current Emissions

Proposed Emissions

Actual Emissions

		HAP Uncontrolled Emissions lb/yr	Current Control Efficiency	HAP Controlled Emissions lb/yr	Proposed Control Efficiency	HAP Controlled Emissions lb/yr	% Change
WB 1	Sterilizer Vacuum Pump Emissions (95%)	269873.15	99.9996%	1.1	99.9996%	1.1	
	Aeration Emissions (4%)	11363.08	99.90%	11.4	99.9%	11.4	
	Sterilizer Back Vent Emissions (1%)	2840.77	0	2841	99.0%	28	
	Fugitives (0.05% est.)		0	142	0	142	
WB 2	Sterilizer Vacuum Pump Emissions (95%)	132653.25	99.94%	79.6	99.9%	79.6	
	Aeration Emissions (4%)	5585.4	99.96%	2.2	99.96%	2.2	
	Sterilizer Back Vent Emissions (1%)	1396.35	0	1396	99.0%	14	
	Fugitives (0.05% est.)		0	70	0	70	
	Total Process Emissions:			4331		137	97%
	Total Emissions:			4543		348	92%



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Next Steps

- **Tour of the Willowbrook 1 Facility:**

- Paul Krett will lead the tour through the facility
- Dave DeFina (VP of Global Engineering) is available to describe the Backvent Project

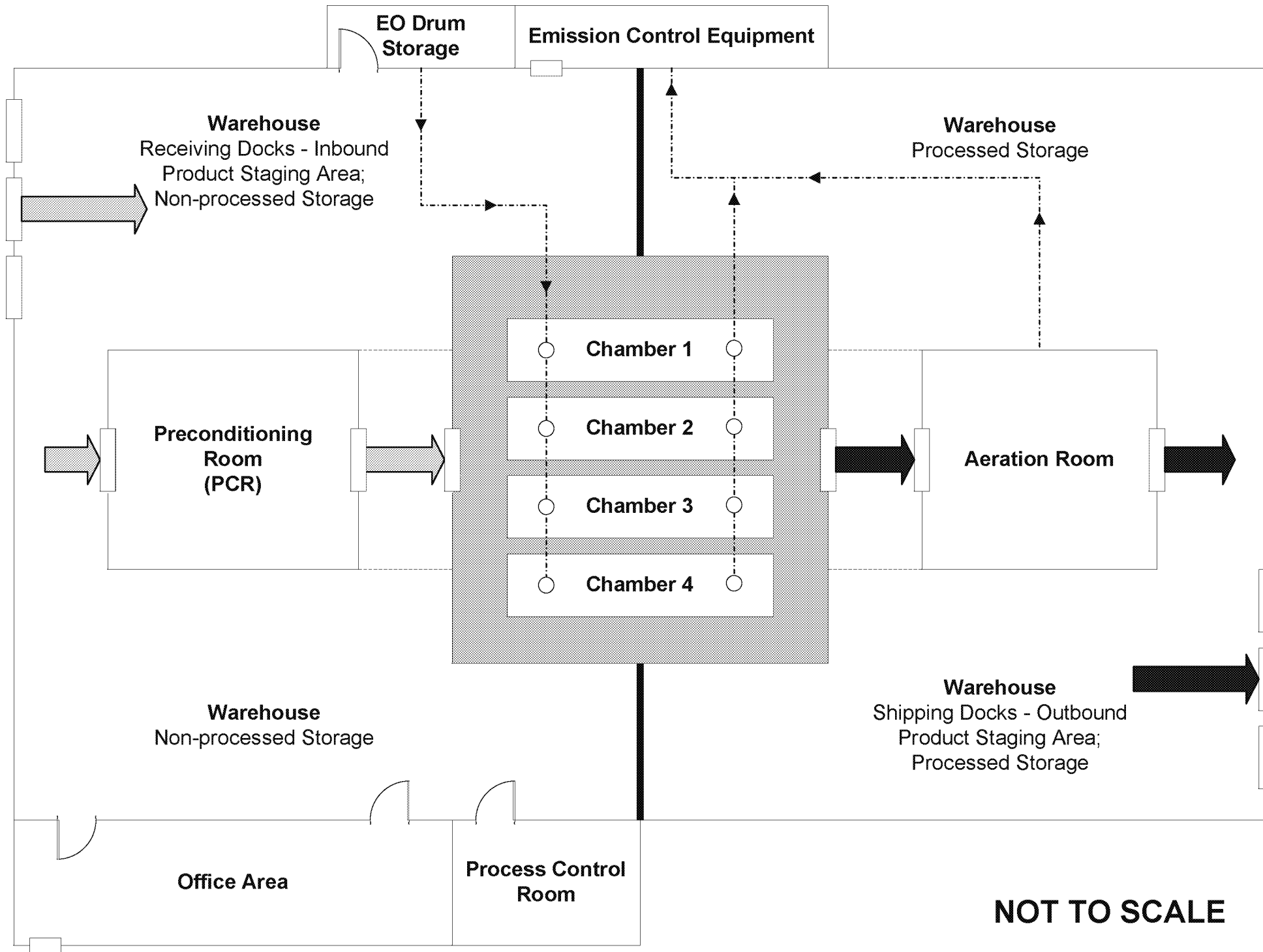
- **Next Steps:**

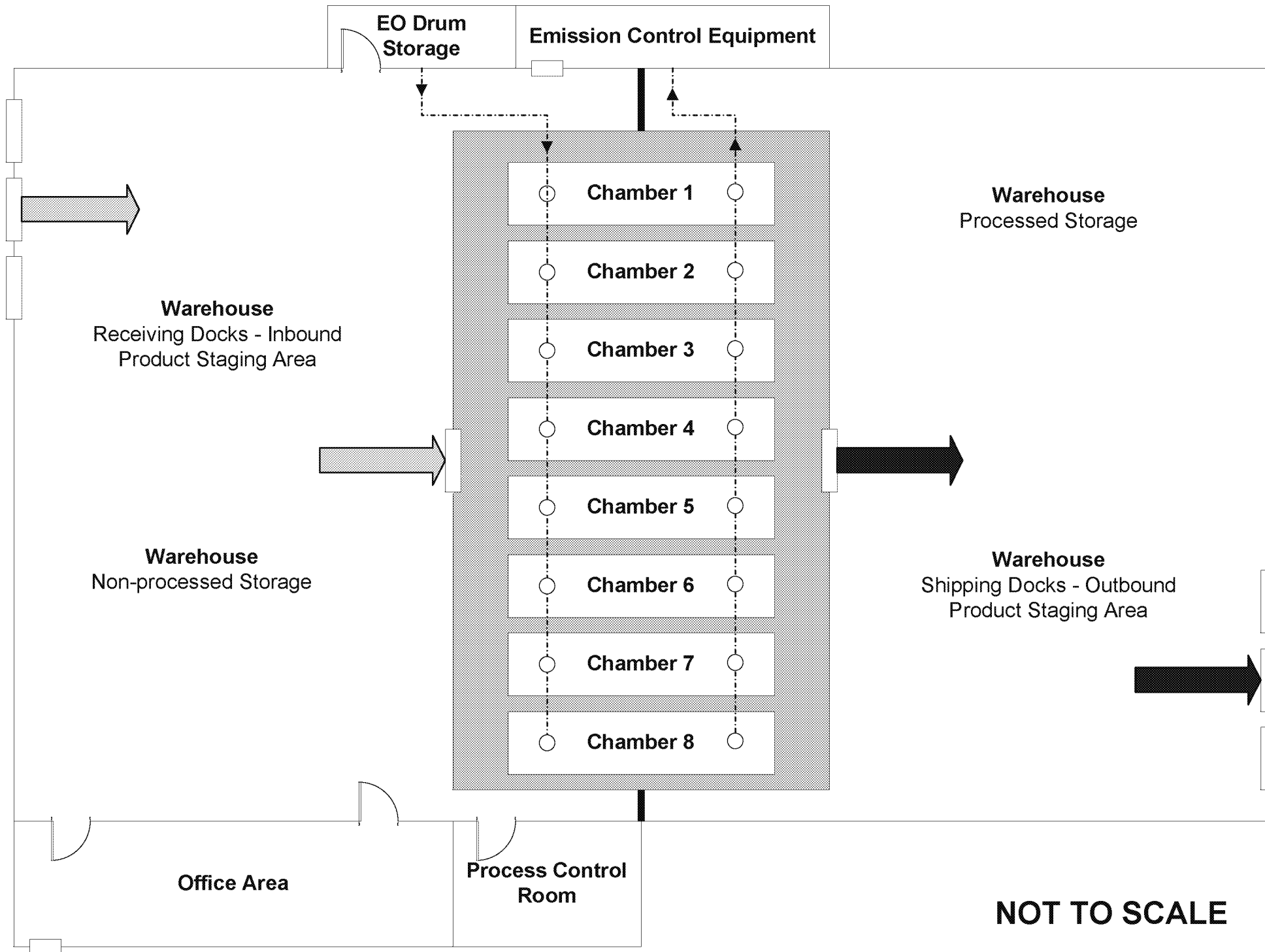
- Sterigenics to complete WB Backvent project
- Sterigenics to provide input to the modelling data for WB stacks
- US EPA to provide details on the monitoring data to consultants
- US EPA / Sterigenics to review working together for future monitoring

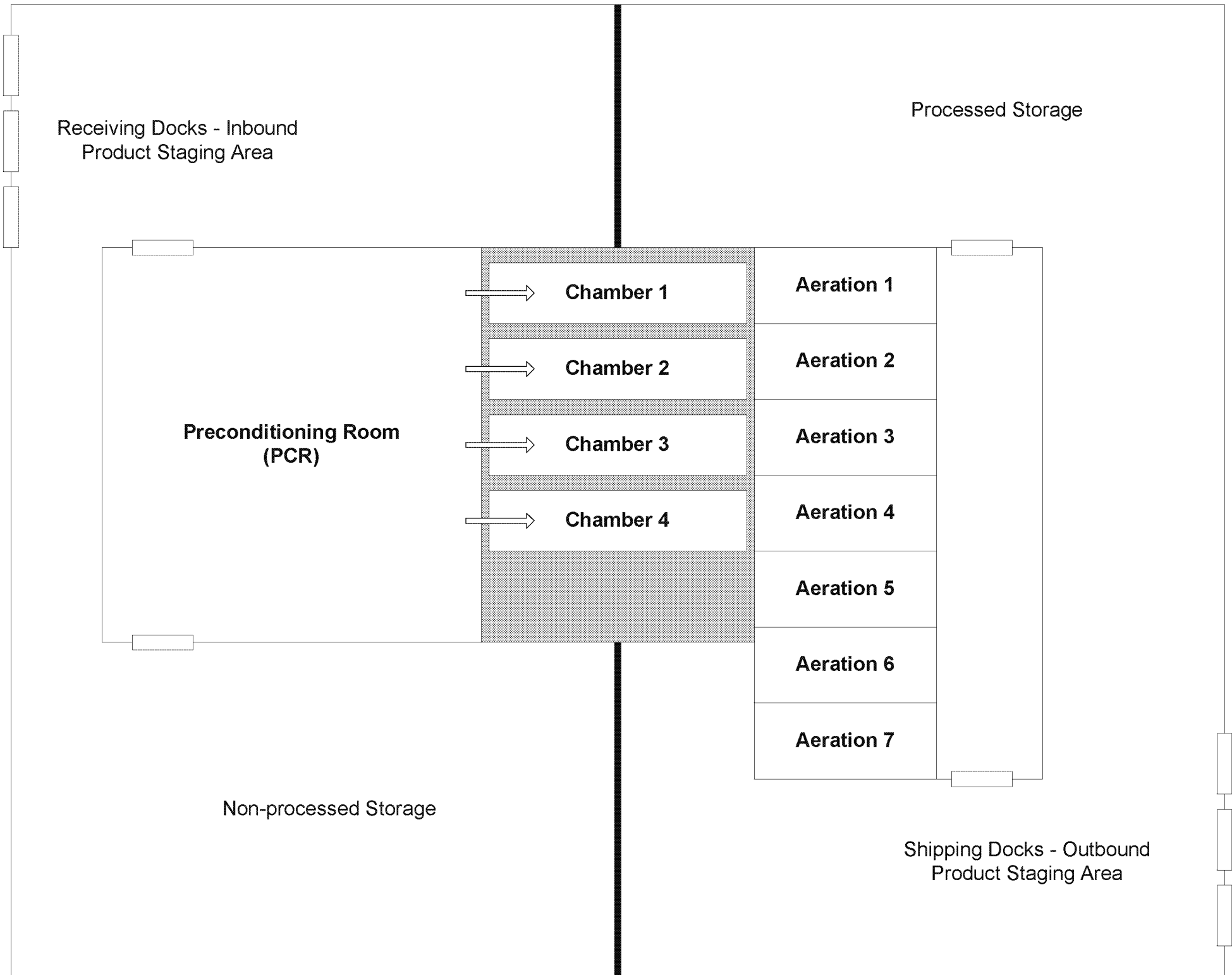


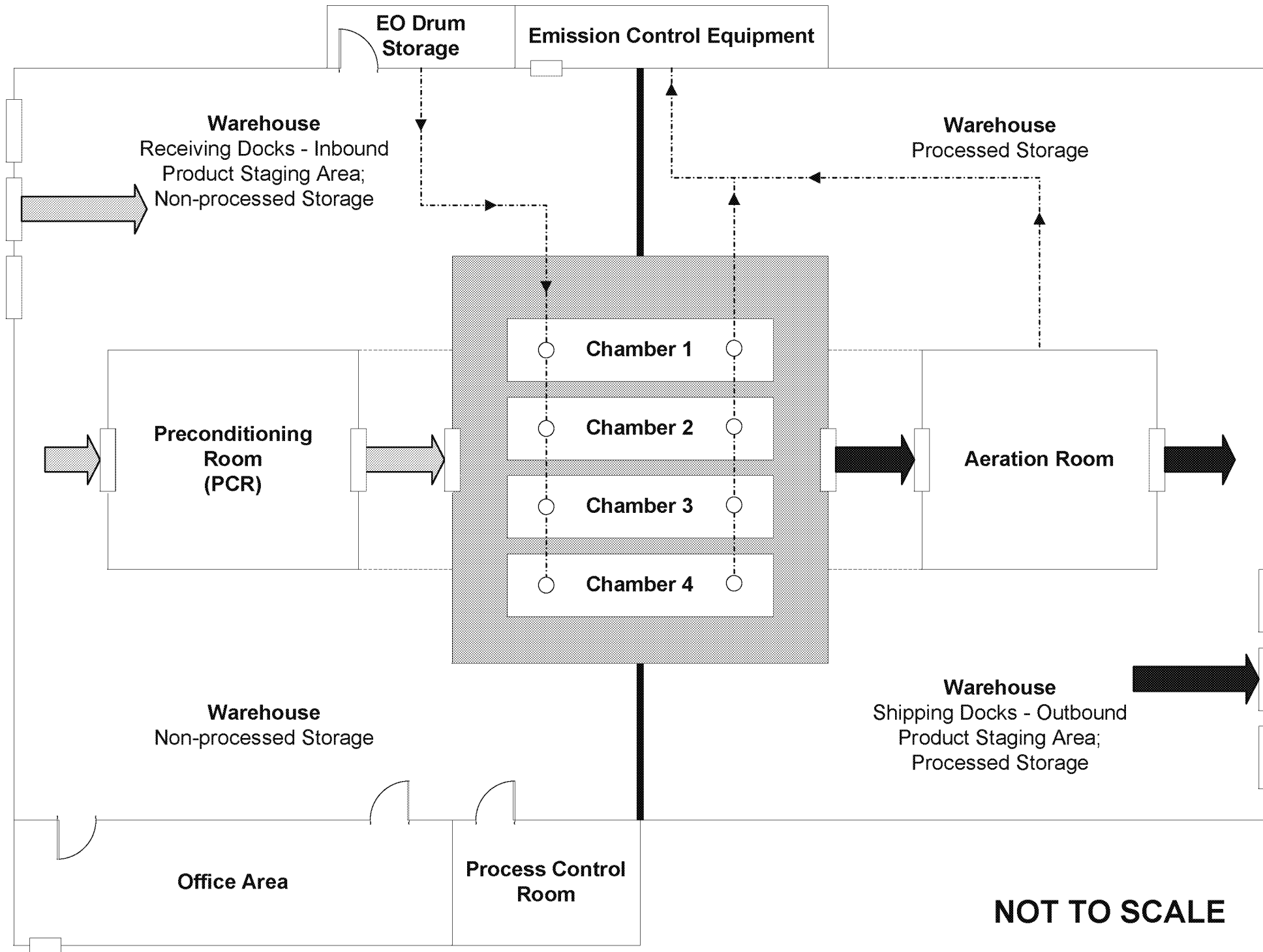
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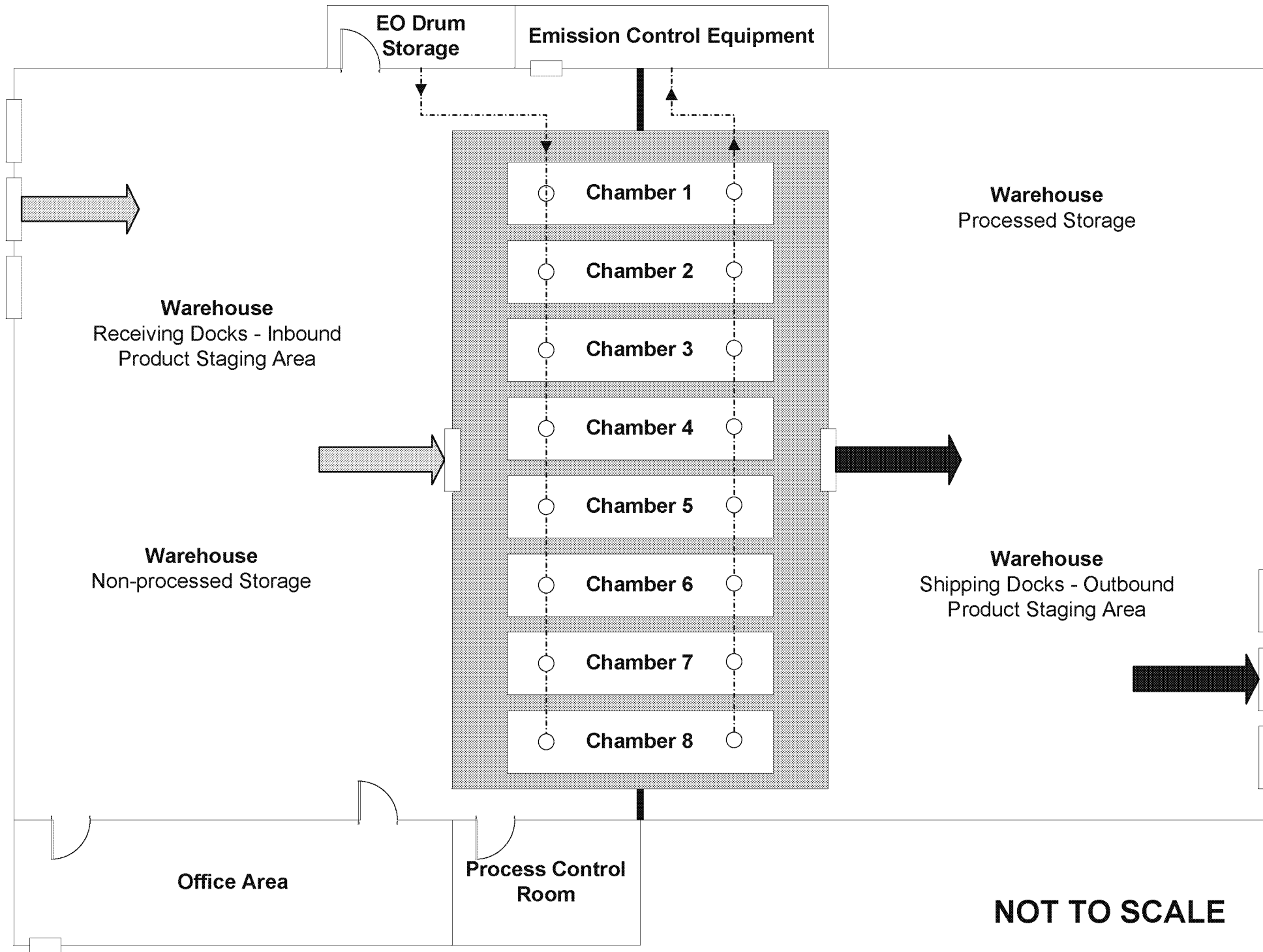
29

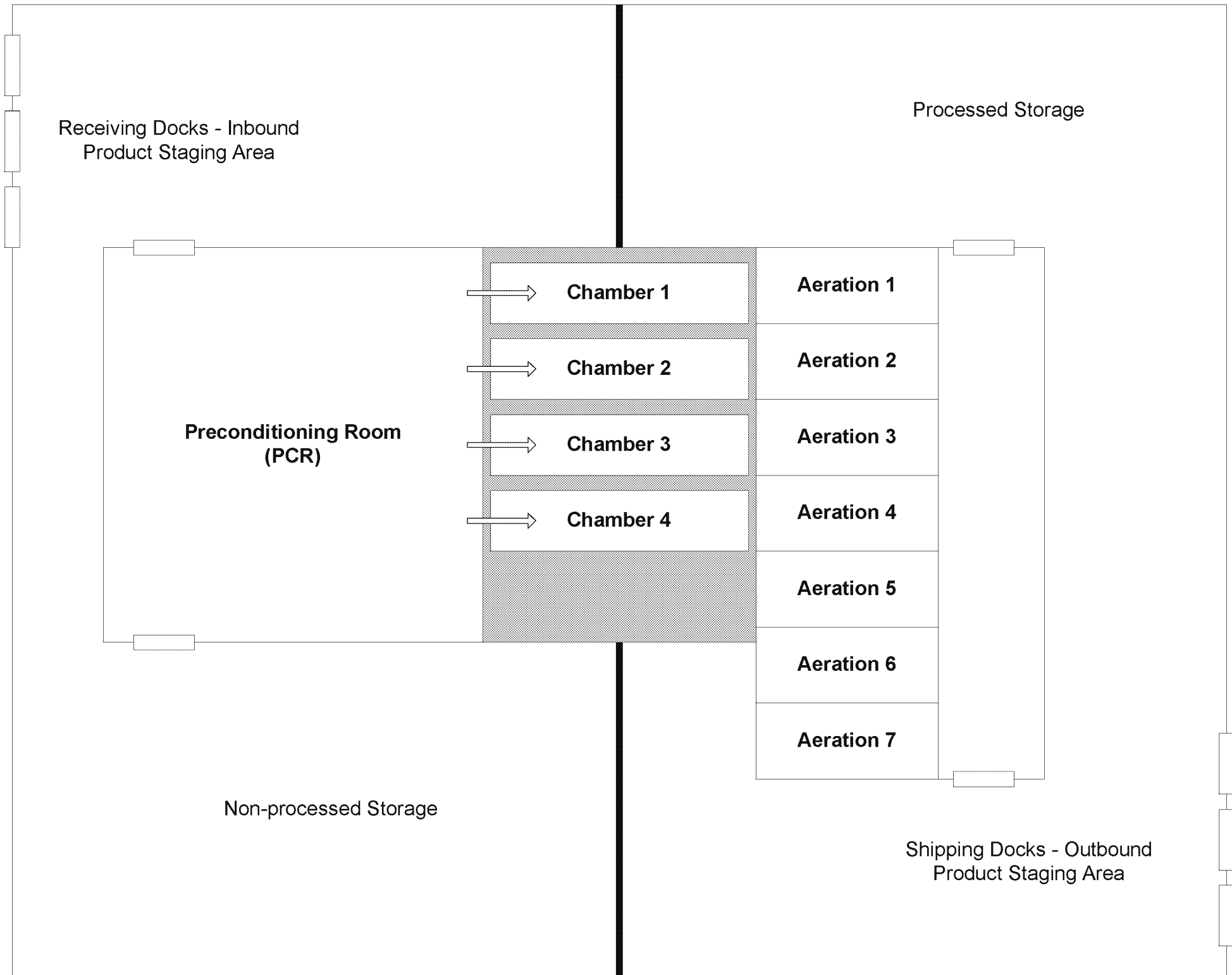












Message

From: Hoffman, Kathy [KHoffman@sterigenics.com]
Sent: 7/18/2018 1:43:04 AM
To: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]
Subject: RE: Flir Camera

Thanks. See you tomorrow at 10am.

From: Cain, Alexis [mailto:cain.alexis@epa.gov]
Sent: Tuesday, July 17, 2018 3:09 PM
To: Hoffman, Kathy; Nam, Ed
Subject: RE: Flir Camera

Hi Kathy—here's who will be coming from USEPA:

Ed Nam
Kathryn Siegel
Margaret Sieffert
Phuong Nguyen
David Ogulei
Alexis Cain

We look forward to seeing you tomorrow!

Alexis Cain
USEPA-Region 5
(312) 886-7018
cain.alexis@epa.gov

From: Hoffman, Kathy [mailto:KHoffman@sterigenics.com]
Sent: Monday, July 16, 2018 10:10 PM
To: Cain, Alexis <cain.alexis@epa.gov>; Nam, Ed <nam.ed@epa.gov>
Subject: Flir Camera

I reviewed the Flir camera in a little more detail on the internet and with our Engineering Department. This seems to be a thermal imaging camera. We are familiar with such cameras and use them periodically to test for hot spots in our electrical equipment at the EO facilities. At this point in time, we do not think they will be beneficial to us for measuring potential EO sources. Let's proceed with our visit and tour this week and we can revisit the topic if you feel differently.

I am looking forward to seeing you on Wednesday at 10am.

Regards,
Kathy

Kathleen Hoffman
Senior Vice President - Global Environmental, Health & Safety and Technical Services
Sterigenics, A Sotera Health Company
2015 Spring Road, Suite 650

Oak Brook, IL 60523
Office: 630.928.1758
khoffman@sterigenics.com



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This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Message

From: Sieffert, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DBB22FA4A9B14C1E8C634B2E0791CEFA-MSIEFFER]
Sent: 6/26/2018 6:14:19 PM
To: Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]
Subject: RE: Draft Questions for Sterigenics
Attachments: 20180131 Sterigenics Modeling Parameters email.pdf; Sterigenics Modeling Parameters

Not sure if a pdf or the outlook file would be better. Attached are both.

From: Cain, Alexis
Sent: Tuesday, June 26, 2018 1:00 PM
To: Sieffert, Margaret <Sieffert.Margaret@epa.gov>; Nguyen, Phuong <Nguyen.Phuong@epa.gov>; Marcus, Danny <marcus.danny@epa.gov>
Cc: Siegel, Kathryn <siegel.kathryn@epa.gov>
Subject: Draft Questions for Sterigenics

Deliberative Process / Ex. 5

Kathy and Kevin—

We look forward to tomorrow's conference call. We have compiled some questions, some of which we may be able to discuss on tomorrow's call, others which may be best dealt with through email.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5 & Enforcement/Investigatory / Ex. 7(a)

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5 & Enforcement/Investigatory / Ex. 7(a)

Deliberative Process / Ex. 5 & Enforcement/Investigatory / Ex. 7(a)

Alexis Cain
USEPA-Region 5
(312) 886-7018
cain.alexis@epa.gov

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 6/22/2018 4:33:24 PM
To: Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: FW: DRAFT/DELIBERATIVE
Attachments: EtO Health Values 06 22 18.pdf

Importance: High

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Konkus, John
Sent: Friday, June 22, 2018 12:26 PM
To: Wheeler, Andrew <wheeler.andrew@epa.gov>; Jackson, Ryan <jackson.ryan@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>
Cc: Thiede, Kurt <thiede.kurt@epa.gov>; Woods, Clint <woods.clint@epa.gov>
Subject: DRAFT/DELIBERATIVE
Importance: High

Draft Region Five Communications Plan

Deliberative Process / Ex. 5

Dear Fellow Region Five Employees,

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Cathy Stepp

Appointment

From: Shappley, Ned [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5FC7FDE372054AB5AC38F24B9072B73D-SHAPPLEY, N]
Sent: 9/27/2018 2:04:08 PM
To: Shappley, Ned [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5fc7fde372054ab5ac38f24b9072b73d-Shappley, N]; Thurman, James [Thurman.James@epa.gov]; Witt, Jon [Witt.Jon@epa.gov]; Johnson, Steffan [johnson.steffan@epa.gov]; Fruh, Steve [Fruh.Steve@epa.gov]; Chen, Xi [Chen.Xi@epa.gov]; Merrill, Raymond [Merrill.Raymond@epa.gov]
CC: Segall, Robin [Segall.Robin@epa.gov]; Wilson, Holly [Wilson.Holly@epa.gov]; Hemby, James [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6deabe7daccd45f3b32a6291293686d8-JHEMBY]; Rimer, Kelly [Rimer.Kelly@epa.gov]; Smith, Darcie [Smith.Darcie@epa.gov]; Godfrey, Janice [Godfrey.Janice@epa.gov]
Subject: FW: Sterigenics De-brief to Region 5
Location: E201

Start: 9/27/2018 7:00:00 PM
End: 9/27/2018 8:00:00 PM
Show Time As: Tentative

-----Original Appointment-----

From: Shappley, Ned
Sent: Wednesday, 26 September, 2018 17:02
To: Shappley, Ned; Thurman, James; Witt, Jon; Johnson, Steffan; Fruh, Steve; Chen, Xi; Merrill, Raymond
Cc: Robin Segall (Segall.Robin@epa.gov); Wilson, Holly
Subject: Sterigenics De-brief to Region 5
When: Thursday, 27 September, 2018 3:00 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: E201

Adobe Connect Room to follow

Message

From: Sieffert, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DBB22FA4A9B14C1E8C634B2E0791CEFA-MSIEFFER]
Sent: 7/16/2018 2:49:12 PM
To: Delisio, Edward [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9319e61692214d5897de4181b1d61d67-EDelisio]
Subject: RE: Modeling files

Unfortunately, I don't have that one.

From: Delisio, Edward
Sent: Monday, July 16, 2018 9:48 AM
To: Sieffert, Margaret <Sieffert.Margaret@epa.gov>
Subject: RE: Modeling files

I need the x,y,conc excel file

Edward Delisio
USEPA Region 5
Chicago, Illinois
ph.312-886-1303
fx. 312-692-2044
delisio.edward@epa.gov

From: Sieffert, Margaret
Sent: Monday, July 16, 2018 9:43 AM
To: Delisio, Edward <delisio.edward@epa.gov>
Subject: FW: Modeling files

Would the output file be useful?

From: Cain, Alexis
Sent: Friday, June 22, 2018 9:12 AM
To: Hoffman, Kathy <KHoffman@sterigenics.com>
Cc: Nguyen, Phuong <Nguyen.Phuong@epa.gov>; Sieffert, Margaret <Sieffert.Margaret@epa.gov>
Subject: Modeling files

Kathy—here are our modeling input/output files.

Alexis Cain
USEPA-Region 5
(312) 886-7018
cain.alexis@epa.gov

Message

From: Lyons, Troy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=15E4881C95044AB49C6C35A0F5EEF67E-LYONS, TROY]
Sent: 10/6/2018 8:03:49 PM
To: adm15.arwheeler.email [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6f061a85b2e14828934c1a85cc4d5122-adm15.arwhe]
CC: Jackson, Ryan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=38bc8e18791a47d88a279db2fec8bd60-Jackson, Ry]; Molina, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d19c1d68da1a4587866e1850f22a6ae5-Molina, Mic]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Baptist, Erik [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=10fc1b085ee14c6cb61db378356a1eb9-Baptist, Er]; Wright, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=11616a3db06f4eceb13ea26c7e6dc1f0-Wright, Pet]; Cook, Steven [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=394f5dede6184bc083cf9390e49a192c-Cook, Steve]
Subject: Durbin-Duckworth Call 10-10-18.docx
Attachments: Durbin-Duckworth Call 10-10-18.docx; ATT00001.txt

Please find attached your briefing note for next week' s call w Senators Durbin and Duckworth. Let us know if you need additional information. We have some time before the call w the Senators to brief you.

Message

From: Burton, Tamika [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=207E0F24FD934D6D8A3E4C400A311638-BURTON, TAM]
Sent: 10/5/2018 6:28:50 PM
Subject: Weekly Report 10.05.2018
Attachments: weekly report 10.05.2018.pdf; weekly report 10.05.2018.docx

Importance: High

Good Afternoon,
Please see the attached Weekly report for the week ending 10.05.2018
Have a great weekend!

Tamika Burton
Special Assistant: Office of the Administrator
MC 1104A Room
(202) 564-4771 (d)
(202) 507-3630 (c)
burton.tamika@epa.gov



Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 8/13/2018 8:15:31 PM
To: Jackson, Ryan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=38bc8e18791a47d88a279db2fec8bd60-Jackson, Ry]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: NATA & EtO pager
Attachments: EtO pager 081318.docx; ATT00001.htm

Background materials on similarly situated facilities in terms of ethylene oxide

Begin forwarded message:

From: "Koerber, Mike" <Koerber.Mike@epa.gov>
Date: August 13, 2018 at 4:00:33 PM EDT
To: "Woods, Clint" <woods.clint@epa.gov>
Cc: "Lewis, Josh" <Lewis.Josh@epa.gov>
Subject: Fwd: NATA & EtO pager

Clint - Here is a pager which shows the regional scope of the ethylene oxide issue. Please let know if you need anything more.

Mike

Begin forwarded message:

From: "Sasser, Erika" <Sasser.Erika@epa.gov>
Date: August 13, 2018 at 3:56:16 PM EDT
To: "Koerber, Mike" <Koerber.Mike@epa.gov>
Cc: "Smith, Darcie" <Smith.Darcie@epa.gov>, "Rimer, Kelly" <Rimer.Kelly@epa.gov>, "Jones, Rhea" <Jones.Rhea@epa.gov>
Subject: NATA & EtO pager

Hope this will work.

Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 8/14/2018 11:50:11 PM
To: Jackson, Ryan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=38bc8e18791a47d88a279db2fec8bd60-Jackson, Ry]
Subject: FW: NATA & EtO pager
Attachments: EtO pager 081318.docx; ATT00001.htm

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

From: Woods, Clint
Sent: Monday, August 13, 2018 4:16 PM
To: Jackson, Ryan <jackson.ryan@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>
Subject: Fwd: NATA & EtO pager

Background materials on similarly situated facilities in terms of ethylene oxide

Begin forwarded message:

From: "Koerber, Mike" <Koerber.Mike@epa.gov>
Date: August 13, 2018 at 4:00:33 PM EDT
To: "Woods, Clint" <woods.clint@epa.gov>
Cc: "Lewis, Josh" <Lewis.Josh@epa.gov>
Subject: Fwd: NATA & EtO pager

Clint - Here is a pager which shows the regional scope of the ethylene oxide issue. Please let know if you need anything more.

Mike

Begin forwarded message:

From: "Sasser, Erika" <Sasser.Erika@epa.gov>
Date: August 13, 2018 at 3:56:16 PM EDT
To: "Koerber, Mike" <Koerber.Mike@epa.gov>
Cc: "Smith, Darcie" <Smith.Darcie@epa.gov>, "Rimer, Kelly" <Rimer.Kelly@epa.gov>, "Jones, Rhea" <Jones.Rhea@epa.gov>
Subject: NATA & EtO pager

Hope this will work.

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 8/17/2018 8:00:42 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Subject: EtO pager 081318.docx
Attachments: EtO pager 081318.docx; ATT00001.txt

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 6/22/2018 3:49:23 PM
To: Konkus, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=555471b2baa6419e8e141696f4577062-Konkus, Joh]
Subject: RE: DRAFT

Personal Phone / Ex. 6

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Konkus, John
Sent: Friday, June 22, 2018 11:48 AM
To: Woods, Clint <woods.clint@epa.gov>
Subject: RE: DRAFT

What's your #?

From: Woods, Clint
Sent: Friday, June 22, 2018 11:46 AM
To: Konkus, John <konkus.john@epa.gov>
Subject: RE: DRAFT

John,

A few suggestions below

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Two additional technical items which may be too weedy:

Deliberative Process / Ex. 5

From: Konkus, John
Sent: Friday, June 22, 2018 10:54 AM
To: Woods, Clint <woods.clint@epa.gov>
Subject: DRAFT
Importance: High

Internal – Deliberative – Draft

Dear Fellow Region Five Employees,

Deliberative Process / Ex. 5

Thank you all for your continued work for the American people and please enjoy your weekend.

Cathy Stepp

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 7/27/2018 1:45:30 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Fwd: ATSDR Sterigenics EtO Consult Letter-final.pdf
Attachments: ATSDR Sterigenics EtO Consult Letter-final.pdf; ATT00001.htm

Begin forwarded message:

From: "Wehrum, Bill" <Wehrum.Bill@epa.gov>
Date: July 26, 2018 at 1:59:40 PM EDT
To: "Tsirigotis, Peter" <Tsirigotis.Peter@epa.gov>, "Koerber, Mike" <Koerber.Mike@epa.gov>
Cc: "Gunasekara, Mandy" <Gunasekara.Mandy@epa.gov>, "Woods, Clint" <woods.clint@epa.gov>
Subject: FW: ATSDR Sterigenics EtO Consult Letter-final.pdf

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

From: Stepp, Cathy
Sent: Thursday, July 26, 2018 1:21 PM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>
Subject: ATSDR Sterigenics EtO Consult Letter-final.pdf

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 5/13/2019 2:36:14 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400

Start: 5/16/2019 3:30:00 PM
End: 5/16/2019 4:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 3/11/2019 2:04:02 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Call with Phil McNabb re: Sterigenics

Attachments: Untitled Attachment

Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 3/11/2019 8:00:00 PM

End: 3/11/2019 8:30:00 PM

Show Time As: Busy

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Appointment

From: Lewis, Josh [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22D1D3BB3F84436A524F76AB6C79D7E-JOLEWIS]
Sent: 12/4/2018 8:18:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 **Personal Phone / Ex. 6**
Start: 12/10/2018 10:00:00 PM
End: 12/10/2018 10:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 5/13/2019 2:36:14 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: HOLD || Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400
Start: 5/16/2019 3:30:00 PM
End: 5/16/2019 4:00:00 PM
Show Time As: Busy

Appointment

From: Harlow, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV]
Sent: 2/4/2019 3:01:34 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Phone call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 2/4/2019 4:30:00 PM
End: 2/4/2019 5:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 4/1/2019 8:57:15 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 Personal Phone / Ex. 6
Start: 4/4/2019 4:30:00 PM
End: 4/4/2019 5:00:00 PM
Show Time As: Busy

Appointment

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 2/5/2019 4:38:51 AM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Phone call with Phil MacNAbb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6
Start: 2/4/2019 4:30:00 PM
End: 2/4/2019 5:00:00 PM
Show Time As: Busy

Appointment

From: Gunasekara, Mandy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=53D1A3CAA8BB4EBAB8A2D28CA59B6F45-GUNASEKARA,]
Sent: 10/29/2018 3:54:20 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Declined: Phone call with Phil Macnabb re: Sterigenics (confirmed)
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 10/29/2018 8:00:00 PM
End: 10/29/2018 8:30:00 PM
Recurrence: (none)

Appointment

From: Lewis, Josh [Lewis.Josh@epa.gov]
Sent: 3/25/2019 7:16:14 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]

Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400

Start: 3/25/2019 7:30:00 PM
End: 3/25/2019 8:15:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 9/17/2018 3:56:29 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.Clint@epa.gov]; Ringel, Aaron [ringel.aaron@epa.gov]; Davis, Matthew [Davis.Matthew@epa.gov]
Subject: Call with Rep. Foster re: Willowbrook, IL Sterigenics facility and ethylene oxide
Location: WJC - N 5400 + 202-991-0477 + 311-0813
Start: 9/18/2018 2:00:00 PM
End: 9/18/2018 2:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 12/19/2018 8:37:12 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]

Subject: HOLD || Meeting with NACD and CICI re: Sterigenics
Location: WJC - N 5400

Start: 1/24/2019 7:00:00 PM
End: 1/24/2019 7:45:00 PM
Show Time As: Busy

Appointment

From: Nam, Ed [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A2653F1DDD59470688BA557DD84D9690-NAM, ED]
Sent: 2/22/2019 4:55:53 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Region 5 re: Sterigenics
Location: WJC - N + **Personal Phone / Ex. 6**
Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 10/26/2018 6:39:14 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beadda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]
Subject: Phone call with Phil Macnabb re: Sterigenics (confirmed)
Location: WJC - N 5400 **Personal Phone / Ex. 6**
Start: 10/29/2018 8:00:00 PM
End: 10/29/2018 8:30:00 PM
Show Time As: Busy

Appointment

From: Thiede, Kurt [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3CC09FAC5ACC4CE1BA689FB2CE70D459-THIEDE, KUR]
Sent: 2/22/2019 4:38:25 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Declined: Call with Region 5 re: Sterigenics
Location: WJC - N + **Personal Phone / Ex. 6**
Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM

Recurrence: (none)

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 9/24/2018 2:58:22 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clint]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Hanson, Andrew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=976b280c3eaf4e50b91a25d75466cf3c-Hanson, Andrew]; Cory, Preston (Katherine) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bfd80b15f6d04a3ba11fc8ca3c85bc50-Cory, Kathe]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beadda2affa44-Harlow, Dav]
Subject: Meeting with Chairman Cronin, DuPage County, Illinois
Attachments: RE: Meeting request
Location: WJC - N 5400 + Video with RTP C430 - **Personal Phone / Ex. 6**
Start: 9/26/2018 1:30:00 PM
End: 9/26/2018 2:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 4/22/2019 7:04:13 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
CC: Harlow, David [harlow.david@epa.gov]

Subject: Call with Phil MacNabb re: Sterigenics

Start: 4/22/2019 8:00:00 PM
End: 4/22/2019 8:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 9/24/2018 7:56:48 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.Clint@epa.gov]; Harlow, David [harlow.david@epa.gov]
Subject: Meeting with Sterigenics (confirmed)
Attachments: CONFIRMED RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods
Location: WJC - N 5400

Start: 9/26/2018 5:00:00 PM
End: 9/26/2018 5:45:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 12/3/2018 4:51:16 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 +
Start: 12/3/2018 8:00:00 PM
End: 12/3/2018 8:30:00 PM
Show Time As: Busy

Appointment

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 11/7/2018 2:00:59 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6
Start: 11/8/2018 8:00:00 PM
End: 11/8/2018 8:30:00 PM
Show Time As: Busy

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 2/22/2019 4:38:50 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Meeting Forward Notification: Call with Region 5 re: Sterigenics
Location: WJC - N **Administrator / Ex. 6**
Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM

Recurrence: (none)

Appointment

From: Microsoft Outlook [MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@usepa.onmicrosoft.com]
Sent: 12/13/2018 5:02:50 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Meeting Forward Notification: Conference call with Willowbrook citizen Jennifer McConaghy re: Sterigenics facility
Location: WJC - N 5400 + conference call
Start: 12/13/2018 5:30:00 PM
End: 12/13/2018 6:00:00 PM
Recurrence: (none)

Appointment

From: Williams, Felicia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6527F339DDB0443C8FA6188E5038057D-FWILLI02]
Sent: 2/22/2019 4:45:23 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Region 5 re: Sterigenics
Location: WJC - N + **Personal Phone / Ex. 6**
Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 4/10/2019 4:12:12 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clint]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - 5400 + Personal Phone / Ex. 6
Start: 4/17/2019 8:00:00 PM
End: 4/17/2019 8:30:00 PM
Show Time As: Busy

Appointment

From: Gunasekara, Mandy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=53D1A3CAA8BB4EBAB8A2D28CA59B6F45-GUNASEKARA,]
Sent: 11/5/2018 9:02:11 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Declined: Phone call with Phil Macnabb re: Sterigenics (confirmed)
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 11/5/2018 9:00:00 PM
End: 11/5/2018 9:30:00 PM
Recurrence: (none)

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 2/22/2019 9:08:43 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Meeting Forward Notification: Call with Region 5 re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6
Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM

Recurrence: (none)

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 11/8/2018 6:31:37 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: HOLD || Meeting with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 11/13/2018 2:30:00 PM
End: 11/13/2018 3:15:00 PM
Show Time As: Busy

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 2/22/2019 9:07:14 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Meeting Forward Notification: Call with Region 5 re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6
Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM

Recurrence: (none)

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 4/10/2019 4:12:12 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - 5400 + Personal Phone / Ex. 6 13
Start: 4/17/2019 8:00:00 PM
End: 4/17/2019 8:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 4/10/2019 4:12:12 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - 5400 + **Personal Phone / Ex. 6**
Start: 4/15/2019 8:00:00 PM
End: 4/15/2019 8:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 3/11/2019 2:04:57 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 Personal Phone / Ex. 6
Start: 3/11/2019 8:00:00 PM
End: 3/11/2019 8:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 12/3/2018 5:09:00 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 12/3/2018 10:00:00 PM
End: 12/3/2018 10:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 11/26/2018 3:02:47 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Phil McNabb re: Sterigenics

Location: **Personal Phone / Ex. 6**

Start: 11/26/2018 9:30:00 PM
End: 11/26/2018 10:00:00 PM
Show Time As: Busy

Message

From: Wehrum.Bill@epa.gov [Wehrum.Bill@epa.gov]
Sent: 3/25/2019 7:30:00 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clint]
Subject: Re: heads up and a question

Do you plan to attend?

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

On Mar 25, 2019, at 3:20 PM, Woods, Clint <woods.clint@epa.gov> wrote:

FYI for 3:30

Begin forwarded message:

From: "Davis, Alison" <Davis.Alison@epa.gov>
Date: March 25, 2019 at 10:26:04 AM EDT
To: "Woods, Clint" <woods.clint@epa.gov>
Cc: "DeLuca, Isabel" <DeLuca.Isabel@epa.gov>
Subject: heads up and a question

Hi Clint,
We heard that Sterigenics *may* release a report this week looking at EtO emissions from other sources. If that occurs, and we are asked for comment, how about this statement:

Deliberative Process / Ex. 5

Thanks.

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 3/11/2019 2:04:02 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Call with Phil McNabb re: Sterigenics
Attachments: Untitled Attachment; Untitled Attachment
Location: WJC - N 5400 + **Personal Phone / Ex. 6**

Start: 3/11/2019 8:00:00 PM
End: 3/11/2019 8:30:00 PM
Show Time As: Busy

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 3/11/2019 7:28:57 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 3/11/2019 8:15:00 PM
End: 3/11/2019 8:45:00 PM
Show Time As: Busy

Appointment

From: Administrator / Ex. 6 D=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=83F9AE79D99D4661AA37D687409C1993-ADM15WHEELE]
Sent: 3/7/2019 5:09:39 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Meeting with Margie Donnell, Joanna Chlystek, Srikant Rao, Urszula Tanouye, Neringa Zymanicus, Gabriela Tejeda-Rios and Melissa Alvado (Stop Sterigenics and Citizens 4 Clean Air)
Location: Administrator's office
Start: 3/13/2019 1:30:00 PM
End: 3/13/2019 2:00:00 PM
Show Time As: Tentative

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 3/18/2019 8:00:37 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 **Personal Phone / Ex. 6**
Start: 3/18/2019 8:00:00 PM
End: 3/18/2019 8:30:00 PM
Show Time As: Busy

Appointment

From: Thiede, Kurt [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3CC09FAC5ACC4CE1BA689FB2CE70D459-THIEDE, KUR]
Sent: 2/25/2019 6:53:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Fwd: Call with Region 5 re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM
Show Time As: Busy

Appointment

From: Harlow, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV]
Sent: 3/18/2019 8:00:40 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 #
Start: 3/18/2019 8:00:00 PM
End: 3/18/2019 8:30:00 PM
Show Time As: Busy

Appointment

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 2/25/2019 8:56:24 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6
Start: 2/25/2019 9:00:00 PM
End: 2/25/2019 9:30:00 PM
Show Time As: Busy

Appointment

From: Thiede, Kurt [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3CC09FAC5ACC4CE1BA689FB2CE70D459-THIEDE, KUR]
Sent: 2/22/2019 9:10:49 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Region 5 re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM

Recurrence: (none)

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 4/10/2019 4:12:12 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clint]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beadda2affa44-Harlow, Dav]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - 5400 **Personal Phone / Ex. 6**
Start: 4/17/2019 5:30:00 PM
End: 4/17/2019 6:00:00 PM
Show Time As: Busy

Appointment

From: Atkinson, Emily [Atkinson.Emily@epa.gov]

Sent: 12/14/2018 12:19:30 PM

To: Wehrum, Bill [Wehrum.Bill@epa.gov]

Subject: Accepted: FW: Conference call with Willowbrook citizen Jennifer McConaghy re: Sterigenics facility

Location: WJC - N 5400 + conference call

Start: 12/13/2018 5:30:00 PM

End: 12/13/2018 6:00:00 PM

Show Time As: Busy

Appointment

From: Davis, Alison [Davis.Alison@epa.gov]
Sent: 12/12/2018 11:44:24 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]

Subject: Accepted: Conference call with Willowbrook citizen Jennifer McConaghy re: Sterigenics facility
Location: WJC - N 5400 + conference call

Start: 12/13/2018 5:30:00 PM
End: 12/13/2018 6:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 3/11/2019 2:04:57 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 { **Personal Phone / Ex. 6** }
Start: 3/11/2019 8:00:00 PM
End: 3/11/2019 8:30:00 PM
Show Time As: Busy

Appointment

From: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Sent: 5/28/2019 8:51:12 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Sterigenics Willowbrook Facility: Open House & Community Meeting
Location: Marriott Chicago Southwest at Burr Ridge, IL
Start: 5/29/2019 8:00:00 PM
End: 5/30/2019 3:00:00 AM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 5/13/2019 2:36:14 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 5/16/2019 3:30:00 PM
End: 5/16/2019 4:00:00 PM
Show Time As: Busy

Appointment

From: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Sent: 5/28/2019 8:51:12 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Sterigenics Willowbrook Facility: Open House & Community Meeting
Location: Marriott Chicago Southwest at Burr Ridge, IL
Start: 5/29/2019 8:30:00 PM
End: 5/30/2019 3:00:00 AM
Show Time As: Busy

Message

From: Wehrum.Bill@epa.gov [Wehrum.Bill@epa.gov]
Sent: 5/24/2019 9:38:06 PM
To: Macnabb, Philip [PMacnabb@sterigenics.com]
Subject: Re: Call

Sure. Personal Phone / Ex. 6

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

> On May 24, 2019, at 5:37 PM, Macnabb, Philip <PMacnabb@sterigenics.com> wrote:

>

> Do you have a few minutes for a quick call?

>

> Sent from my iPhone

> This e-mail and any files transmitted with it may contain privileged and/or confidential information.

If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 4/15/2019 2:47:52 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil MacNabb re: Sterigenics
Location: WJC - 5400 **Personal Phone / Ex. 6**
Start: 4/17/2019 8:00:00 PM
End: 4/17/2019 8:30:00 PM
Show Time As: Busy

Appointment

From: Administrator / Ex. 6 [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=83F9AE79D99D4661AA37D687409C1993-ADM15WHEELE]
Sent: 6/5/2019 6:54:38 PM
To: Adm15Wheeler.Calendar [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=83f9ae79d99d4661aa37d687409c1993-Adm15Wheele]; Jackson, Ryan [jackson.ryan@epa.gov]; Bodine, Susan [bodine.susan@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Woods, Clint [woods.clint@epa.gov]; Harlow, David [harlow.david@epa.gov]
Subject: Delegated to David Harlow: Meeting with Tom Roberts, Michael Petras, and Phil MacNabb (Sterigenics, Sotera Health)
Attachments: sterigenics - EPA Meeting Request Form - Administrator Wheeler 5.21.19.docx
Location: Administrator's office
Start: 6/21/2019 7:00:00 PM
End: 6/21/2019 7:30:00 PM
Show Time As: Free

Appointment

From: Administrator / Ex. 6 [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=83F9AE79D99D4661AA37D687409C1993-ADM15WHEELER]
Sent: 6/5/2019 6:54:38 PM
To: Adm15Wheeler.Calendar [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=83f9ae79d99d4661aa37d687409c1993-Adm15Wheeler]; Jackson, Ryan [jackson.ryan@epa.gov]; Bodine, Susan [bodine.susan@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Woods, Clint [woods.clint@epa.gov]
Subject: Delegated to Clint Woods: Meeting with Tom Roberts, Michael Petras, Matthew Klaben, Phil MacNabb, and Byron Taylor (Sotera Health)
Attachments: sterigenics - EPA Meeting Request Form - Administrator Wheeler 5.21.19.docx
Location: Administrator's office
Start: 6/21/2019 7:00:00 PM
End: 6/21/2019 7:30:00 PM
Show Time As: Free

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 4/1/2019 8:57:15 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 **Personal Phone / Ex. 6**
Start: 4/4/2019 6:00:00 PM
End: 4/4/2019 6:30:00 PM
Show Time As: Busy

Appointment

To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.Clint@epa.gov]; David Harlow (harlow.david@epa.gov) [harlow.david@epa.gov]

Subject: Meeting with Phil McNabb re: Sterigenics

Location: WJC - N 5400

Start: 3/25/2019 7:30:00 PM

End: 3/25/2019 8:15:00 PM

Show Time As: Busy

Recurrence: (none)

Appointment

From: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Sent: 3/6/2019 3:31:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: FYI: EPA webinar: Update of EPA's Ethylene Oxide Monitoring data for Willowbrook, Illinois
Location: WJC-N 5400

Start: 3/7/2019 9:00:00 PM
End: 3/7/2019 10:00:00 PM
Show Time As: Free

Subject: Webinar for EPA EtO data for Willowbrook for January 22 - February 11, 2019

EPA webinar: Update of EPA's Ethylene Oxide Monitoring data for Willowbrook, Illinois

The U.S. Environmental Protection Agency will hold a webinar at 3 p.m. central time, Thursday, March 7, 2019 to review air quality monitoring data for Willowbrook, Illinois, covering January 22, 2019 to February 11, 2019. For more information on this webinar, please review the details below:

Webinar:

Date: Thursday, March 7, 2019

Time: 3:00 to 4:00 p.m. (CT)

Meeting Link: <https://epawebconferencing.acms.com/willowbrook>

Phone line is Personal Phone / Ex. 6
Access code

*Note: If you are at a computer, please listen through your computer speakers. We have a capacity of 500 people via computer. If you're not able to be at a computer, you'll be able to listen to the Webinar by phone. The phone line has a capacity of 125.

Materials will be posted on the website after the webinar at <https://www.epa.gov/il/sterigenics-willowbrook-facility>

If you have never attended an Adobe Connect meeting before, test your connection by visiting http://admin.adobeconnect.com/common/help/en/support/meeting_test.htm. You may also get a quick overview by visiting <http://www.adobe.com/products/adobeconnect.html>.

1. Click "Enter as a Guest"
2. Type in your first & last name and organization
3. Click "Enter Room"
4. You will be in the room!

Appointment

From: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Sent: 2/21/2019 2:53:15 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.Clint@epa.gov]
Subject: EPA Webinar: Update on Ethylene Oxide Monitoring in Willowbrook, Illinois
Location: WJC-N 5400

Start: 2/21/2019 7:00:00 PM
End: 2/21/2019 8:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 2/14/2019 2:05:01 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 2/14/2019 6:15:00 PM
End: 2/14/2019 6:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 2/11/2019 8:21:48 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clint]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 2/19/2019 6:00:00 PM
End: 2/19/2019 6:30:00 PM
Show Time As: Busy

Appointment

From: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Sent: 2/5/2019 2:58:43 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: EPA Webinar: Update on Ethylene Oxide Monitoring in Willowbrook, Illinois
Location: 5415
Start: 2/5/2019 7:00:00 PM
End: 2/5/2019 8:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 2/4/2019 2:10:26 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: Phone call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6 3
Start: 2/4/2019 4:30:00 PM
End: 2/4/2019 5:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 2/1/2019 8:39:31 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Call with Phil MacNabb re: Sterigenics

Attachments: Untitled Attachment

Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 2/11/2019 9:00:00 PM

End: 2/11/2019 9:30:00 PM

Show Time As: Busy

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Appointment

From: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Sent: 1/28/2019 9:38:39 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Call with Phil MacNabb re: Sterigenics
Start: 1/28/2019 10:30:00 PM
End: 1/28/2019 11:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 12/12/2018 8:46:54 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Mike Koerber (Koerber.Mike@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
CC: Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: Conference call with Willowbrook citizen Jennifer McConaghy re: Sterigenics facility
Location: WJC - N 5400 + conference call
Start: 12/13/2018 5:30:00 PM
End: 12/13/2018 6:00:00 PM
Show Time As: Busy

Alison # Personal Phone / Ex. 6

Jennifer # Personal Phone / Ex. 6

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 12/4/2018 8:18:10 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 - **Personal Phone / Ex. 6**
Start: 12/17/2018 9:00:00 PM
End: 12/17/2018 9:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 12/4/2018 8:13:24 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clint]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6
Start: 12/10/2018 10:00:00 PM
End: 12/10/2018 10:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 12/3/2018 4:49:19 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clint]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 12/3/2018 10:00:00 PM
End: 12/3/2018 10:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 11/29/2018 8:28:50 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.Clint@epa.gov]
Subject: Community Forum on Ethylene Oxide
Location: Willowbrook, IL
Start: 11/30/2018 1:00:00 AM
End: 11/30/2018 4:00:00 AM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 11/29/2018 8:25:38 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.Clint@epa.gov]
Subject: Sterigenics Facility Tour
Location: Willowbrook, IL
Start: 11/29/2018 7:00:00 PM
End: 11/29/2018 9:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 11/29/2018 8:24:53 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.Clint@epa.gov]
Subject: Meeting with Willowbrook elected officials
Attachments: FINAL-willowbrook elected AGENDA 11-29.docx
Location: Willowbrook, IL

Start: 11/29/2018 5:00:00 PM
End: 11/29/2018 6:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 11/26/2018 2:59:35 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beadda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]

Subject: Call with Phil McNabb re: Sterigenics

Location: Personal Phone / Ex. 6

Start: 11/26/2018 9:30:00 PM
End: 11/26/2018 10:00:00 PM
Show Time As: Busy

Appointment

From: Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]
Sent: 11/20/2018 3:47:56 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Weinstock, Lewis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=df30e068efb24a24b35d63be0596ad9b-LWEINS02]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Tsirigotis, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d19c179f3ccb4fadb48e3ae85563f132-PTSIRIGO]; Alexander Dominguez (dominguez.alexander@epa.gov) [dominguez.alexander@epa.gov]
CC: David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beadda2affa44-Harlow, Dav]; Wayland, Richard [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d69f0a870909402ebd66847003aa6437-Wayland, Chet]
Subject: EtO Update
Attachments: Re: EtO Update
Location: WJC-N 5400 + **Personal Phone / Ex. 6**
Start: 11/20/2018 5:15:00 PM
End: 11/20/2018 5:45:00 PM
Show Time As: Busy

To: Bill Wehrum, Clint Woods, Kelly Rimer, Lewis Weinstock, Alison Davis, Peter Tsirigotis, Alex Dominguez



Re: EtO Update

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 11/1/2018 9:00:36 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beadda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]

Subject: Phone call with Phil Macnabb re: Sterigenics (confirmed)

Attachments: Untitled Attachment

Location: WJC - N 5400 + **Personal Phone / Ex. 6**

Start: 11/5/2018 9:00:00 PM

End: 11/5/2018 9:30:00 PM

Show Time As: Busy

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

TO: Bill Wehrum, David Harlow, Clint Woods, Mandy Gunasekara

Note: This meeting was scheduled out of a phone call with Phil MacNabb. We called him back to confirm the phone call.

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 10/26/2018 6:39:14 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beadda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]
Subject: Phone call with Phil Macnabb re: Sterigenics (confirmed)
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 10/29/2018 8:00:00 PM
End: 10/29/2018 8:30:00 PM
Show Time As: Busy

TO: Bill Wehrum, David Harlow, Clint Woods, Mandy Gunasekara

Note: This meeting was scheduled out of a phone call with Phil MacNabb. Mr. MacNabb called OAR and requested this meeting. We called him back to confirm the phone call. He was reluctant to give an email address. There is no email trail.

Appointment

From: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Sent: 5/28/2019 8:51:12 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.Clint@epa.gov]
Subject: Sterigenics Willowbrook Facility: Open House & Community Meeting
Location: Marriott Chicago Southwest at Burr Ridge, IL
Start: 5/29/2019 8:00:00 PM
End: 5/30/2019 3:00:00 AM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 5/13/2019 2:36:14 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Idsal, Anne [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b1beca8121fb47a08e82b6bf2247a79b-Idsal, Anne]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 5/16/2019 3:30:00 PM
End: 5/16/2019 4:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 4/30/2019 2:08:00 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Call with Phil Macnabb re: Sterigenics
Location: WJC - N 5400 Personal Phone / Ex. 6
Start: 5/6/2019 7:30:00 PM
End: 5/6/2019 8:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 4/22/2019 7:04:13 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 4/22/2019 8:00:00 PM
End: 4/22/2019 8:30:00 PM
Show Time As: Busy

Message

From: Jennifer McConahy Personal Address / Ex. 6
Sent: 2/25/2019 9:48:44 PM
To: Wheeler, Andrew [wheeler.andrew@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Lewis, Josh [Lewis.Josh@epa.gov]
Subject: Timeline of ethylene oxide, chemical at center of suburban pollution controversy - Chicago Tribune

Timeline of ethylene oxide, chemical at center of suburban pollution controversy - Chicago Tribune

<https://www.chicagotribune.com/news/ct-sterigenics-eto-timeline-htmlstory.html>

Message

From: Jennifer McConahy Personal Address / Ex. 6
Sent: 3/5/2019 2:29:24 PM
To: Lewis, Josh [Lewis.Josh@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Wheeler, Andrew [wheeler.andrew@epa.gov]
Subject: Looks like I was on to something....
Attachments: Sterigenics-Head-Met-Repeatedly-With-EPA-Over-Toxic-Carcinogen.pdf

Guess I am not the only one questioning Mr. Wehrum's communication with Sterigenics!

Message

From: Jennifer McConahy [Personal Address / Ex. 6]
Sent: 2/23/2019 3:39:47 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Lewis, Josh [Lewis.Josh@epa.gov]; Wheeler, Andrew [wheeler.andrew@epa.gov]
Subject: Former Sterigenics Worker Tells Of Leaking Ethylene Oxide At Plant – CBS Chicago

Former Sterigenics Worker Tells Of Leaking Ethylene Oxide At Plant – CBS Chicago

<https://chicago.cbslocal.com/2019/02/22/sterigenics-willowbrook-ethylene-oxide/>

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 2/22/2019 9:08:43 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Meeting Forward Notification: Call with Region 5 re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6
Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM

Recurrence: (none)

Your meeting was forwarded

Newton, Cheryl has forwarded your meeting request to additional recipients.

Meeting

Call with Region 5 re: Sterigenics

Meeting Time

Friday, February 22, 2019 4:15 PM-5:00 PM.

Recipients

Thiede, Kurt

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Message

From: Jennifer McConahy Personal Address / Ex. 6
Sent: 2/15/2019 5:10:12 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Wheeler, Andrew [wheeler.andrew@epa.gov]
Subject: Time's up, EPA. Solve the Sterigenics problem. - Chicago Tribune

Time's up, EPA. Solve the Sterigenics problem. - Chicago Tribune

<https://www.chicagotribune.com/news/opinion/editorials/ct-edit-sterigenics-epa-air-pollution-cancer-20190214-story.html>

Message

From: Woods, Clint [woods.clint@epa.gov]
Sent: 3/5/2019 1:42:05 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Fwd: Call yesterday
Attachments: 11 10 2014 ltr -Aaron Yeow.pdf; ATT00001.htm; AdvaMed EPA EtO Letter.pdf; ATT00002.htm; EO issue brief-FINAL.docx; ATT00003.htm

Begin forwarded message:

From: "Crist, Greg" <GCrist@AdvaMed.org>
Date: March 5, 2019 at 8:40:43 AM EST
To: "Woods, Clint" <woods.clint@epa.gov>
Subject: Call yesterday

Clint,

Thanks for your time yesterday. Very helpful. I welcome the oppty to share what challenges my industry faces on the public health impact as this EtO issue continues to unfold.

Attached are two letters – one sent in 2014 with regard to the IRIS and industry concerns there. We stand by those still today. And second, another letter sent to Administrator Wheeler last year regarding Sterigenics and supply-chain concerns.

Finally, I attach a 2-page issue brief that seeks to capture a brief picture of what industry faces.

Thanks again. greg

Greg Crist

Chief Advocacy Officer, Head of External Affairs
Advanced Medical Technology Association (AdvaMed)
701 Pennsylvania Ave, NW, Suite 800
Washington, DC 20004-2654
P: 202.434.7240
C: 703.887.4078
www.advamed.org
www.lifechanginginnovation.org





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Tel: 202 783 8700
Fax: 202 783 8750
www.AdvaMed.org

November 10, 2014

Mr. Aaron Yeow
Designated Federal Officer (DFO)
Science Advisory Board Staff Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-4164

Re: Comments to the Chemical Assessment Advisory Committee for the Integrated Risk Information System Evaluation of the Inhalation Carcinogenicity of Ethylene Oxide (Revised External Review Draft - August 2014)

Dear Mr. Yeow:

The Advanced Medical Technology Association (AdvaMed) welcomes the opportunity to provide comments to the Chemical Assessment Advisory Committee for the Integrated Risk Information System Evaluation of the Inhalation Carcinogenicity of Ethylene Oxide (revised external draft-August 2014).

The Advanced Medical Technology Association (AdvaMed) is the world's largest trade association representing medical device and diagnostics manufacturers. AdvaMed's companies produce the innovations that are transforming health care through earlier disease detection, less invasive procedures and more effective treatments. AdvaMed has more than 400 member companies, ranging from the largest to the smallest medical technology innovators and manufacturers. AdvaMed advocates for a legal, regulatory and economic environment that advances global health care by assuring worldwide patient access to the benefits of medical technology. The Association promotes policies that foster the highest ethical standards, rapid product approvals, appropriate reimbursement, and access to international markets. Many AdvaMed members provide sterile devices that depend on the use of ethylene oxide as a sterilant.

AdvaMed supports the committee's efforts to ensure the safety of people exposed to ethylene oxide (EO). The mission of any medical device company is to protect and improve the health of the patients we serve. This interest naturally carries over to our concern for our employees. Medical device companies implement individual and industrial environment work area EO exposure monitoring systems, employee training programs, emergency management systems, and risk management practices that typically exceed federal requirements for employee safety. We underscore the high regard our industry places on human health and safety – including that of our own employees.

Bringing innovation to patient care worldwide



Our members are committed to ensuring employee safety and reducing environmental impact. Over the past decade, our members have invested hundreds of millions of dollars to improve workplace safety and environmental health. Through implementation of new technology our members have continued to reduce employee exposures and emissions in accordance with current OSHA and NESHAP regulations.

AdvaMed members have significant concerns regarding the U.S. Environmental Protection Agency's (EPA) cancer risk estimates for ethylene oxide and the revised draft IRIS assessment. We fully support the comments submitted by the American Chemistry Council's (ACC) EO Panel and the Ethylene Oxide Sterilization Association, Inc. (EOSA). We are deeply concerned about the reliability and accuracy of the IRIS assessment and the potential negative impact the assessment could have on the healthcare industry and, most importantly, patient health and safety.

Many medical devices, including those used for infusion therapy and administration of medications; implantable devices such as pacemakers; and devices used in surgical settings must be terminally sterilized before use. In order to ensure patient safety, the Food and Drug Administration (FDA) has established requirements for the assurance of sterility for medical devices. The mode of sterilization must be validated to ensure its safety and effectiveness as well as its impact on device performance. The mode of sterilization must be shown to be compatible with the product as well as packaging, and ensure sterility of the device.

Our members currently sterilize hundreds of millions of medical devices each year in the U.S. with EO. Many of these devices cannot be sterilized in any other way because of the sensitive nature of the device materials, the components, or the complexity of design. The majority of these devices are not resistant to damage caused by moist heat, radiation, and other modes of sterilization. Examples of devices that can only be sterilized using EO include implantable devices containing electronic components and batteries, anesthesia products, combination products (devices that contain drugs) and IV devices. For a number of other types of products, our members utilize other modes of sterilization, such as gamma irradiation and electron beam sterilization when possible, but for many devices there is currently no viable alternative technology to EO.

The direct impact of any elimination or severe restriction on the use of EO as a sterilant would compromise the U.S. healthcare system. At best, inventory shortages would likely result, and at worst, many medical devices such as pacemakers and implantable cardioverter/defibrillators would no longer be available to patients. It should also be noted that changes in sterilization processes and methods would require clearance or approval by the FDA prior to implementation. Supporting evidence would have to be provided by the manufacturer demonstrating that the new sterilization process does not adversely affect the device and that the same level of sterility is achieved.

While we agree that the NIOSH study contains relevant data, AdvaMed disagrees with the broad categorization of such data and in the gross estimation of exposure to EO prior to 1978. Categorical exposure estimates from the NIOSH study are subject to a number of potential errors which could include random errors in estimating historical exposures, errors and misclassification in establishing category boundaries, and manipulation of category boundaries. Upon review of this data, it is unclear why some data from the NIOSH cohort was discarded, when in fact this data appeared relevant to the evaluation and statistically important. In addition, we believe that the application of a single, long lag is more suitable for this cohort than the single 15-year lag used in the evaluation.

We disagree with the use of categorical data in linear regression modeling to determine low-exposure risk. We also disagree with the use of a two-piece linear spline to estimate cancer potency as this incorrectly overestimates the carcinogenicity of EO and has not been used to estimate potency of other carcinogens.

Furthermore, we contend that the evaluation failed to consider several studies deemed relevant by the Science Advisory Board (SAB). This includes, but is not limited to Teta (Teta et al, 1993, 1999) and Greenberg (Greenberg et al, 1990). Failure to include relevant data may further bias the results of the evaluation.

We respectfully request that the SAB-Chemical Assessments Advisory Committee (CAAC) carefully consider not only the inaccuracy and bias of the IRIS assessment, but the impact on the proposed risk estimate on the ability to supply sterile medical products to patients, clinicians, and the general public.

Thank you for the opportunity to provide comments. AdvaMed members are committed to ensuring the availability of safe and effective medical devices and diagnostics to patients and healthcare professionals in the United States and around the world. The availability of ethylene oxide as a sterilant for these devices is an essential requirement for the safety and effectiveness of sterile devices.

Sincerely,

/s/

Ruey C. Dempsey RAC
Associate Vice President
Technology and Regulatory Affairs

Ethylene Oxide (EO)

Overview of EO use with medical devices

Background on Ethylene Oxide (EO)

Ethylene oxide is a flammable, colorless gas used to make other chemicals that are employed in making a range of products, including textiles, plastics, detergents and adhesives. Ethylene oxide also is used to sterilize equipment and plastic devices that cannot be sterilized by steam, gamma and other sterilants such as medical devices.

As a low-temperature sterilizer, ethylene oxide gas won't damage these types of medical devices. Ethylene oxide also is used to disinfect other health care products such as bandages and ointments, reducing potential damage to the product that may occur from other means of sterilization.

Medical Device Sterilization

AdvaMed members' products range from needles and bandages to replacement joints, heart valve replacements and imaging equipment. Safety and effectiveness of medical technologies, encompassing the manufacture, sale and use of devices is regulated by the Food and Drug Administration (FDA) and other global regulatory bodies. For many medical devices that come in contact with patients and health care providers, product sterility is critical for preventing infections. A very high percentage of surgeries involve at least one device that has been sterilized with EO.

Universally, approximately 50% of all medical devices are sterilized with EO, accounting for more than 20 billion devices annually. Due to material sensitivities, EO is the only option for sterilizing a large number of life-saving and life-enhancing devices, primarily those made of plastics or containing electronics, that cannot tolerate exposure to the extreme temperatures, radiation and moisture present in other sterilization methods.

The effects of steam and radiation on anti-microbial coatings on single-use plastic devices makes them an unacceptable alternative. Material integrity and degradation and damage to sensitive, sophisticated electronic devices and their components are also major concerns. Another benefit of sterilization with EO is for medical devices used in surgical procedures that need to be sterilized inside of packaging. EO vapor allows sterilization through a variety of packaging materials.

Examples of Medical Devices that Require EO Sterilization

Fiberoptic endoscopes	Renal Hemodialysis sets
Specula	Tubing sets/bloodlines
Surgical kits	Gowns and drapes
Syringes	Heart valves
Sutures	Pacemakers
Catheters	Surgical Drills
IV sets	Pumps
Plastic tubing	Respirators
Inhalation therapy supplies	Electrical equipment
Surgical telescopes	Uterine monitors
Anesthesia masks and circuits	Surgical staplers
Renal Peritoneal Dialysis sets	Diagnostic electrode catheter

FDA's Role in Device Sterilization

The FDA and other global regulators play an important role in assuring that manufacturers' sterilization methods are properly validated. FDA regulations, guidance and harmonized international standards have provisions that address the use of ethylene oxide and other sterilants for medical devices. Manufacturers must conduct exhaustive studies to validate that the required sterility assurance levels are achieved by the process and to confirm that exposure to the sterilization process does not adversely affect the device's performance, safety or effectiveness. For this reason, manufacturers must choose sterilization methods that are both effective and compatible with device materials and components.

Standards

Manufacturers using established sterilization methods, such as EO, comply with voluntary consensus standards recognized by the FDA and global regulatory authorities. An international standard (ISO 11135:2014) specifies requirements for the development, validation and routine control of an ethylene oxide sterilization process for medical devices in both the industrial and health care facility settings. Under the standard, manufacturers must identify factors that can affect the sterilant's effectiveness, assess the effects of product exposure to the sterilizing agent, and identify ways to ensure the safety of personnel and protection of the environment during the sterilization process.

Good Manufacturing Practices

Manufacturers using established sterilization methods, such as EO, comply with consensus standards recognized by the FDA. Manufacturers must follow Good Manufacturing Practices (GMPs), that adhere to the Quality Systems requirements relative to the methods used in, and facilities and controls used for, designing, manufacturing, packaging, labeling, storing, installing and servicing of medical devices. This includes the use of contract sterilization firms, as the contract sterilizers are considered to be a part of the manufacturing process.

As part of the U.S. Quality Systems Regulations and other global requirements, manufacturers must validate their sterilization processes and provide evidence that their process is validated at the site where they intend to routinely sterilize in pre-market submissions. Any change to the sterilization method, or location, would typically require a resubmission of validation data and require the product to be cleared by FDA anew, which would be a lengthy process. It must be demonstrated that the sterilization method used will not compromise device safety and effectiveness, and the demonstration of effectiveness must be shown to be acceptable throughout the life of the product, typically 3-5 years. Manufacturers must also choose sterilization methods that are compatible with components and device packaging.

The FDA may deny use of an alternative sterilization process if it determines that either the validation process or subsequent product validation is inadequate. In addition, with many products sold globally, getting approval to move processes often involves approval of multiple regulators outside of the United States.

Biocompatibility

Manufacturers' finished products must meet global standards for material biocompatibility including assessment of EO residuals remaining on the finished product post-sterilization. These requirements ensure patients and health care providers are not exposed to unacceptable levels of chemical residues from the sterilization process, which is an important part of the sterilization validation process. The methods for determining acceptable levels of for product release are well-established. Changing sterilization methods requires manufacturers to reestablish product biocompatibility through repeat studies.

Impact of an EO Ban

For the reasons stated above (e.g., device integrity), for many devices sterilized with EO there is no acceptable alternative.

Manufacturers would also have to redesign many medical devices. Any changes to the mode of sterilization for many products would require major changes to product design, material selection, manufacture and distribution – all regulated by FDA. The redesign process could take several years and require lengthy regulatory approval. The direct impact of any elimination or severe restriction would potentially threaten the entire health care system, as low product inventories and severe backorders of sterile single-use devices could result, putting patients at risk.

#####

Sources: EPA, FDA, American Chemistry Council

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
Sent: 3/1/2019 7:46:31 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clint]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Millett, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c067caa6c93544f78c26ab08cc567d27-Millett, John]
Subject: FW: Med Tech Intelligence: CDRH Warns of Potential Device Shortage with Shutdown of Sterigenics Facility in Illinois

FYI

From: Singer, Joshua
Sent: Friday, March 01, 2019 10:04 AM
To: Kelley, Jeff <kelley.jeff@epa.gov>; Rowan, Anne <rowan.anne@epa.gov>; Deamer, Eileen <deamer.eileen@epa.gov>; Nam, Ed <nam.ed@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Cain, Alexis <cain.alexis@epa.gov>
Cc: Rountree, Jillian <Rountree.Jillian@epa.gov>
Subject: Med Tech Intelligence: CDRH Warns of Potential Device Shortage with Shutdown of Sterigenics Facility in Illinois

FYI. (CDRH is FDA's Center for Devices and Radiological Health.)

https://www.medtechintelligence.com/news_article/cdrh-warns-of-potential-device-shortage-with-shutdown-of-sterigenics-facility-in-illinois/

CDRH Warns of Potential Device Shortage with Shutdown of Sterigenics Facility in Illinois

By Maria Fontanazza

[No Comments](#)

According to the FDA, more than 90% of products sterilized at the facility are medical devices.

Following the [Seal Order](#) issued by the Illinois EPA to shutdown Sterigenics operations on February 15, CDRH is alerting medical device manufacturers that there may be a potential impact to device supply. The problem surrounds the shutdown of the [Sterigenics facility in Willowbrook, Illinois](#), which sterilizes products using ethylene oxide (EtO). The Illinois EPA found alarming levels of EtO emissions in the surrounding residential and commercial areas—"2.1 micrograms per meter³ and 9.1 micrograms per meter³, respectively"—according to a news release from the EPA. These emissions have been a significant cause for concern for some time, as discussed in a recent article in the [Chicago Tribune](#). EtO is an EPA-classified carcinogen and its emissions have been linked to cancer—most specifically lymphoma, leukemia, and stomach and breast cancer, according to the [National Cancer Institute](#).

How does the Sterigenics facility shutdown affect medical device manufacturers? Approximately 90% of the products sterilized at this particular facility are medical devices, according to the FDA. Although the agency is unaware of medical device shortages connected to this issue, it "believes that more than 100 manufacturers and

hundreds of devices may be affected,” according to an FDA statement. It is contacting manufacturers who may be affected by the Sterigenics Willowbrook facility shutdown. CDRH has advised that PMA holders who are affected and plan to use a different facility for product sterilization submit a 180-day site change supplement. 510(k) holders with the same intentions generally do not need to submit a new 510(k), the agency states. In addition, if device manufacturers anticipate a potential device supply shortage, they are urged to report the shortage or supply issue to FDA.

How is Sterigenics responding? The company has called the Illinois EPA’s actions “indefensible”, stating that it is compliance with all state permits and regulations. “Unilaterally preventing a business that is operating in compliance with all state permits and regulations from carrying out its vital function sets a dangerous precedent. The Illinois EPA’s decision will place the health and lives of thousands of patients who rely on the critical medical products sterilized at Willowbrook at risk,” according to a Sterigenics statement released on February 15. Sterigenics has released several statements in defense of the recent developments affecting the company facility. In response to an email sent by CBS Chicago investigative reporter Dave Savini, the company called the EPA’s air sampling “flawed” and stated that people living in Willowbrook have been misinformed for months about how Sterigenics uses EtO to sterilize medical devices. “EO is the only method approved by the Food and Drug Administration (“FDA”) to sterilize millions of critical medical devices. Without sterilization of these devices, individuals needing medical care would face life-threatening infection. By complying with and going above and beyond what the regulations require, the Sterigenics Willowbrook facility safely uses EO and provides a vital service to patients in Illinois and across the country,” according to the Sterigenics statement dated February 1.

Message

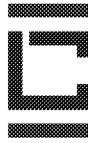
From: Tom Roberts [tcr@vnf.com]
Sent: 2/15/2019 1:39:16 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Molina, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d19c1d68da1a4587866e1850f22a6ae5-Molina, Mic]
Subject: Sterigenics Coorespondence
Attachments: Sterigenics - Response to 2.8.19 Letter pdf final 2.14.19.pdf; 20190213 Ltr LLocke to CBS Chicago re Sterigenics Reporting[1].pdf

Bill / Clint / Michael -- attached for your information are copies of two documents related to the recent CBS Chicago segments regarding Sterigenics' Willowbrook facility. The first is a detailed response to a series of questions from Members of the IL Congressional Delegation. The second is a letter from Sterigenics' attorneys to CBS initiating an investigation of its reporting.

Please contact me if you have any questions.

Thank you.

Tom Roberts
Partner
202.365.7750



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February 13, 2019

Via Email and Federal Express

Not for publication or attribution

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Re: *CBS Chicago Reporting Concerning Sterigenics U.S., LLC*

Dear Beth, Dave, and Mary:

I write on behalf of my client Sterigenics U.S., LLC. Clare Locke LLP has been retained to conduct a detailed libel review regarding CBS Chicago's reporting on the Sterigenics facility in Willowbrook, Illinois. That effort is ongoing and Sterigenics reserves all rights as it evaluates its legal options. But given that CBS Chicago continues to regularly publish stories and broadcast video reports on this subject, we wish to immediately call to your attention numerous recent statements and assertions in CBS's reporting that are false and defamatory, are highly damaging to the company's business and reputation, are adding to the significant misinformation among the general public in DuPage County and the Chicago area, and which require remedial action.

In particular, recent online stories and video reports published by CBS Chicago reporter Dave Savini on February 3, 2019¹ and February 7, 2019² falsely claimed that the Willowbrook Sterigenics facility has been willfully, secretly, and illegally discharging a toxic chemical into the community, and thereby created an imminent risk to public health. In an effort to support this false narrative, Mr. Savini has willfully ignored critical contextual and factual information that undercuts the story CBS Chicago clearly wants to tell — including factual information provided to him by Sterigenics *before publication* of the stories and video reports at issue. He has misled CBS Chicago’s audience by conflating and obscuring the facts to falsely imply that Sterigenics has deliberately violated applicable laws and regulations. He has granted anonymity to unidentified “former employees” and given them a credulous forum to make unfounded allegations, without disclosing these individuals’ biases, motivations, and lack of knowledge of company operations.³ And he has uncritically republished incredible and demonstrably false allegations by biased sources — including plaintiffs’ lawyers with an obvious financial motivation — to serve the purposes of his narrative.⁴ See the example below:

¹ Dave Savini, “Sterigenics Allegedly Covered Up Toxic Emissions, Operated Secret Plants, Former Workers Say,” CBS Chicago (Feb. 3, 2019), *available at* <https://chicago.cbslocal.com/2019/02/03/sterigenics-covered-up-toxic-emissions-operated-secret-plants/>.

² Dave Savini, “Pritzker, Raoul Vow Probe Into Allegations Against Sterigenics,” CBS Chicago (Feb. 7, 2019), *available at* <https://chicago.cbslocal.com/2019/02/07/pritzker-raoul-vow-probe-into-allegations-against-sterigenics/>.

³ These “former employees” were presented in highly dramatized fashion in the video reports, with pixelated faces and altered voices. We have serious concerns about these former employees’ motives and biases. And given that these “former” employees could not face any risk of termination or discipline for speaking to the media, it is difficult to discern any justification or need for anonymity — other than these individuals not having the conviction to put their names and faces behind the allegations they are making. This fact alone should have given CBS obvious reason to doubt their veracity.

⁴ A media defendant can be liable for republishing or participating in the publication of another’s false statement if it acted with a reckless disregard for whether the statement was true or false. *Solaia Tech., LLC v. Specialty Publishing Co.*, 221 Ill. 2d 558, 583 (2006); *Van Horne v. Muller*, 185 Ill.2d 299, 308 (1998); *see also St. Amant v. Thompson*, 390 U.S. 727, 732 (1968) (recklessness may be found “where there are obvious reasons to doubt the veracity of the informant or the accuracy of his reports.”).



As set forth below, Mr. Savini's reports contain egregious, indefensible inaccuracies, and CBS Chicago must act immediately to correct them. We further demand that CBS Chicago's reporters, editors, producers, news directors, and attorneys take immediate steps to ensure that these errors are not repeated in any future online stories or video reports.

As an initial matter, we must note the unbalanced nature of CBS Chicago's coverage as a whole, which has repeatedly sought to portray Sterigenics as a company that has been covertly and willfully poisoning an unsuspecting community. Nothing could be further from the truth. Sterigenics is, first and foremost, a healthcare company. The services Sterigenics provides are critically important to public health because the sterilization of medical and surgical equipment is vital to protect against the spread of deadly bacteria, infections, and viruses in the healthcare setting. The ethylene oxide sterilization performed at the Willowbrook facility helps to ensure that medical devices like procedure kits, surgical trays, and syringes are free of these potentially deadly microorganisms before they ever come in contact with patients. Importantly, with respect to many critical types of medical devices, the federal Food and Drug Administration requires sterilization using ethylene oxide and, as the Environmental Protection Agency recently noted, "Ethylene oxide (EtO) is necessary to assure that some types of medical equipment are sterilized for safe use."⁵

⁵ EPA in Illinois, "Sterigenics Willowbrook Facility: Frequent Questions," EPA.gov,

Moreover, and despite CBS's presentation of ethylene oxide as a dangerous chemical, it is important to note that all humans are exposed to ethylene oxide every day of their lives. There is no scientific or regulatory consensus on what threshold constitutes a hazardous ambient level of ethylene oxide. Background levels of ethylene oxide are always present both because it is naturally occurring — plants and ripening fruit, for example, produce ethylene oxide, as does the human body — and because it is produced from many man-made sources including natural gas furnaces, propane grills, automotive exhaust, cigarette smoke and agricultural applications. To date, the air sample tests from the EPA indicate ambient levels of ethylene oxide in Willowbrook and Burr Ridge residential areas that are generally consistent with the detection levels of ethylene oxide across the Chicago area, and the EPA has not concluded that ethylene oxide levels in Willowbrook are in excess of safe and acceptable exposure levels.⁶ Indeed, the EPA emphasized on February 5, 2019 that the amounts of ethylene oxide being measured near Willowbrook are “extremely low levels in the atmosphere,” and that there are likely unidentified sources of ethylene oxide giving rise to ambient levels in these communities — sources not associated with Sterigenics and potentially not with any industrial or commercial operations.⁷ This is yet another fact that is clearly missing from CBS's reporting — and it appears intentionally so.

The use of ethylene oxide as a medical-equipment sterilization agent is sanctioned and approved by the U.S. Government, and the Willowbrook facility operates, and has consistently operated, in compliance with air permit requirements and federal, state, and local regulations. No regulatory agency has found that the Willowbrook facility's daily operations exceed permissible emissions levels for ethylene oxide. Moreover, Sterigenics has continually worked to improve and upgrade its operations, and to outperform what the regulations require, by voluntarily investing in emissions control systems and processes to ensure public safety. In fact, Sterigenics voluntarily upgraded its emissions control systems at the Willowbrook facility as recently as July 2018, and independent tests confirmed that those recent, voluntary upgrades result in the capture and control of more than 99.9 percent of the ethylene oxide used at the facility — important facts that were also excluded from CBS's reporting. With respect to ongoing testing and assessment, Sterigenics has worked cooperatively and proactively with the U.S. EPA and the Illinois EPA and it will continue to do so.

But none of this critical context has been provided to CBS Chicago's viewers and readers. Instead, both the February 3 and February 7 reports repeatedly assert, as if it were established fact, that the Willowbrook Sterigenics facility is and has been releasing amounts of ethylene oxide that are far in excess of permissible limits. And amazingly, those reports completely failed to inform viewers that the EPA has not supported these claims, and instead has acknowledged that earlier tests of the levels of ethylene oxide levels near the Willowbrook facility, and in other areas of the community, were “flawed” and “may have overstated the amount of ethylene oxide being emitted into the air.” Mr. Savini and CBS Chicago were obviously aware of this, as CBS Chicago reported

available at <https://www.epa.gov/il/sterigenics-willowbrook-facility-frequent-questions#acceptable-level>.

⁶ *See id.*

⁷ EPA, “Webinar Update on EPA Ethylene Oxide Monitoring Data for Willowbrook, Illinois,” youtube.com (Feb. 5, 2019), *available at* https://www.youtube.com/watch?v=0j_O_GJbhc.

on the EPA's consequential disclaimer at the time.⁸ But no mention of this was made in the February 3 and 7 reports. Moreover, as CBS Chicago also knows, the EPA has stated in official correspondence to the Governor of Illinois that "air concentrations of ethylene oxide are not high enough to cause immediate harm to health for the people in and around Willowbrook,"⁹ and the EPA has also consistently and repeatedly admonished that while testing and assessment are ongoing, "[i]t remains premature to draw conclusions about long-term health risks from the data."¹⁰

Update December 7, 2018

EPA has posted results for three days of air quality monitoring in Willowbrook: November 13, 16 and 19

- Monitors detected ethylene oxide in the air at the two sites closest to the Sterigenics facility.
- Monitors did not detect ethylene oxide at the six community-oriented sites -- those at schools and in residential areas.
- It is premature to draw conclusions from the data. EPA plans to continue monitoring in the Willowbrook area for three months and will continue to post data as it becomes available.
- EPA will conduct a full assessment of risk from ethylene oxide in Willowbrook, which we expect to complete by Spring 2019.

In other words, the federal agency with both particular expertise *and* regulatory oversight authority has cautioned against drawing the precise conclusions that CBS Chicago presented to its audience as established fact.¹¹

Another fundamentally false assertion in Mr. Savini's stories has been the repeated conflation of ethylene oxide gas with *ethylene glycol*, a completely different compound that is a *liquid* byproduct of a sterilization process utilizing ethylene oxide. Mr. Savini, in both the February 3 and February 7 broadcasts, ominously referred to ethylene glycol and repeatedly asserted that "[f]ormer Sterigenics employees allege the company ordered workers to dump toxic chemicals directly into the public sewer system" — plainly insinuating to viewers that such an act would have

⁸ Charlie De Mar, "EPA Announce Sterigenics Tests on Ethylene Oxide May Be Misleading," CBS Chicago (Nov. 21, 2018), available at <https://chicago.cbslocal.com/2018/11/21/epa-announces-sterigenics-tests-may-be-misleading/>.

⁹ Sept. 27, 2018 Ltr. Environmental Protection Agency Assistant Administrator W. Wehrum to Governor B. Rauner, available at https://www.epa.gov/sites/production/files/2018-10/documents/signed_response_to_hon_bruce_rauner.pdf.

¹⁰ United States Environmental Protection Agency, "EPA in Illinois: Sterigenics Willowbrook Facility - Latest Update," EPA.gov (updated Feb. 8, 2019) available at <https://www.epa.gov/il/sterigenics-willowbrook-facility-latest-update#20181207>. EPA included the same cautionary disclaimer in its February 5, 2019 update.

¹¹ See *Babb v. Minder*, 806 F.2d 749, 755-56 (7th Cir. 1986) (actual malice may be shown where a publisher "was aware of the seriousness of the allegations" and "their great potential for harm" but lacked an adequate factual basis for making them).

been both illegal and seriously hazardous to public health.¹² But as the company informed Mr. Savini in writing on February 1, 2019, it is *permissible and legal* under DuPage County Wastewater rules to discharge ethylene glycol liquid into the public sanitation sewer system, and it is not considered a health risk to do so. In other words, Mr. Savini knowingly deceived CBS Chicago viewers by presenting an authorized activity as improper, illegal, and imminently hazardous to health. On top of this, Mr. Savini's reports also conspicuously failed to note that even though it would be permissible to do so, it is not the practice of the Willowbrook facility to discharge ethylene glycol into the sanitation sewer system.¹³ Instead, it is safely recycled and sold to a third party for future use in other applications.

But worse still, Mr. Savini also conflated ethylene glycol and ethylene oxide in a way that falsely suggested to readers and viewers that *both* chemicals were released by Sterigenics into the public sewer system. For example, the February 3, 2019 print story states: "Former workers, who do not want to be identified, accused the company of improperly dumping ethylene oxide and ethylene glycol. One former Sterigenics worker said the chemical would be washed directly into the factory drains." During the February 7, 2019 video broadcast Mr. Savini stated, "[f]ormer workers also told CBS 2 bosses ordered certain chemicals dumped right into the environment."¹⁴ At the same time, the broadcast showed a graphic with the words "ETHYLENE OXIDE" and "ETHYLENE GLYCOL" over a background video of liquid pouring from a jar. This was immediately followed by an "anonymous" worker – whose face was pixelated – describing chemicals being hosed into drainage pits, and Mr. Savini summarizing, "that was just washed also, into the public sewer system." By willfully conflating these two chemicals, the broadcasts obviously suggested to viewers that Sterigenics was "dumping" not just ethylene glycol liquid, but also *ethylene oxide gas* directly into the public sewage and water system. Mr. Savini knew this was both untrue and an impossibility – given that, again, ethylene oxide is a *gas* – but he nevertheless deliberately misled viewers in an effort to cause alarm and to make Sterigenics appear as nefarious as possible.¹⁵ These false claims were also repeated in a February 5, 2019 story by CBS Chicago reporter Charlie De Mar, which similarly claimed that "the company instructed workers to improperly dump toxic chemicals, including ethylene oxide." This was again immediately followed by the physically impossible assertions that

¹² *Gibson v. Philip Morris, Inc.*, 292 Ill. App. 3d 267, 274 (1997) (a statement can be found "false by implication" if it is "written in such a manner as to impute" to plaintiff improper conduct).

¹³ Sterigenics today does not handle ethylene glycol in this manner, and the company is not aware of any instances of ethylene glycol liquid being discharged into the public sanitation sewer system since it purchased the Willowbrook facility in 1999. But even if the facility had discharged ethylene glycol into the sewer system, there would have been nothing illegal or improper about doing so.

¹⁴ Even as to ethylene glycol, this is a grossly misleading statement. Any ethylene glycol discharged into a sewer sanitation drain would not be "dumped right into the environment," it would be discharged into a wastewater system and routed to a water treatment plant.

¹⁵ See *Zerangue v. TSP Newspapers, Inc.*, 814 F.2d 1066, 1071 (5th Cir. 1987) ("[C]ourts have upheld findings of actual malice when a defendant failed to investigate a story weakened by inherent improbability, internal inconsistency, or apparently reliable contradictory information," and where the reporter "was aware of facts contradicting [his] story").

ethylene oxide gas was “squeegee[d] right into the drainage pits” and “washed into the public sewer system.”¹⁶

Finally, both the February 3 and February 7 reports repeatedly refer to supposed “secret warehouses” in Willowbrook and Burr Ridge and claim that Sterigenics improperly used these facilities for “off-gassing” of products treated with ethylene oxide. This is simply false. As Mr. Savini was told on February 1, Sterigenics does not store products in warehouses for the purpose of off-gassing. Off-gassing takes place in dedicated locations at the Willowbrook facility that are specially designed for this purpose. Neither the February 3 or February 7 reports provide any factual basis for these false claims. In fact, the February 3 report actually acknowledges that the EPA has no records of any off-gassing occurring at these other locations, but it then proceeds to bizarrely and counterfactually paint this complete absence of evidence as affirmative evidence of some kind of illicit cover up by Sterigenics. To the extent CBS Chicago is relying on “anonymous” sources for these claims, these sources are providing false information. CBS Chicago should know that it will not be able to hide behind anonymous sources to assert a lack of negligence or malice in its reporting, and if necessary, we will seek discovery of not only what information these sources provided, but whether CBS Chicago had reason to question the veracity of that information.¹⁷

The false statements in CBS Chicago’s reporting on Sterigenics have caused, and continue to cause, enormous damage to the company. Foreseeably, these false claims have been widely repeated and republished on social media and by other media outlets. They have also, predictably, caused much consternation among lawmakers and public officials – to the point that CBS Chicago is now, in a sort of perverse feedback loop, triumphantly reporting on the fruits of its own false reporting:

After CBS 2 Investigators Report, Senator Durbin Calls For Investigation Into Sterigenics
CBS 2 Chicago
By Dave Savini
12 February 2019

[VIDEO LINK](#)

A CBS 2 Investigators report on Sterigenics prompts a call for action on the floor of the U.S. Senate.

“Ex-employees of Sterigenics came forward and reported to this television station that ethylene oxide was often released directly into the air surrounding the plant through open doors and vents,” said Illinois U.S Senator Dick Durbin.

Senator Durbin cited a report by CBS 2 Investigator Dave Savini demanding changes at the suburban medical equipment sterilization company. Tests at the Willowbrook plant found levels of a cancer-causing chemical 350 times higher than what the EPA calls an “acceptable risk.”

Calling this an urgent health crisis, Senator Durbin and Senator Tammy Duckworth on Tuesday demanded the EPA find a third-party environmental engineering firm to identify a way to reduce emissions.

¹⁶ Charlie De Mar, “EPA Test Results Show Sterigenics Emitting High Levels of Cancer-Causing Chemical,” CBS Chicago (Feb. 5, 2019), available at <https://chicago.cbslocal.com/2019/02/05/sterigenics-willowbrook-ethylene-oxide-epa/>.

¹⁷ See *Desai v. Hersh*, 954 F.2d 1408, 1412 (7th Cir. 1992) (noting the “general rule” that in a defamation case, “ordinarily the reporters privilege must give way to disclosure”).

Necessary Steps Moving Forward

Journalistic standards require that when a reporter gets the facts wrong, he or she must promptly and publicly issue a correction. Mr. Savini and CBS Chicago must immediately comply with their moral and ethical responsibility to do so. In particular, CBS Chicago must issue public corrections to the February 3 and 7 video reports and stories that inform viewers that: (1) the EPA's testing and assessment in Willowbrook is ongoing, EPA has reached no definitive conclusions, and EPA has cautioned that "It remains premature to draw conclusions about long-term health risks from the data"; (2) ethylene glycol is an entirely separate compound from ethylene oxide, it is not subject to the same handling and emissions rules as ethylene oxide, and it is not illegal or improper to discharge ethylene glycol liquid into sewer sanitation systems; (3) CBS Chicago's insinuations that Sterigenics somehow poured ethylene oxide gas into the public sewer system were false;¹⁸ and (4) CBS Chicago is not aware of any evidence supporting the claim that "off-gassing" occurred at any locations other than the Willowbrook facility. In addition, we demand that CBS Chicago and CBS Local Digital Media's reporters, editors, producers, news directors, and lawyers take immediate steps to ensure that these false statements are not repeated, and that ongoing and future coverage of these issues is fair, balanced, and, most importantly, factually accurate.

Until this matter is resolved, we must insist that CBS Chicago and CBS Local Digital Media direct Mr. Savini, Mr. De Mar, their editors, producers, any other individuals at who participated in the reporting, editing, or publishing of the Sterigenics coverage, and who are participating in the reporting and/or editing of any forthcoming coverage, to preserve and retain all documents, data, and electronically stored information relating in any way to the Willowbrook facility and/or Sterigenics.¹⁹ For the avoidance of doubt, this document hold request includes, without limitation, the ongoing obligation to preserve and retain: (i) all communications with sources and/or potential sources, including phone records; (ii) all communications with all persons who performed any work related to these stories; (iii) all communications between reporters, editors, fact-checkers, producers, and attorneys involved in these stories; (iv) all reporters' and editors' notes regarding these stories, and all drafts, versions, and scripts of these stories; and (v) the complete web browser histories and web search histories of all those involved in these stories. These items should be preserved regardless of the medium, format, or device on which they are hosted, and regardless of whether they appear in documents, drafts, notes, emails, text messages, voicemail messages, social media posts, audio and video recordings, or in any other form.

Please confirm receipt of this letter and that CBS Chicago and CBS Local Digital Media intend to adhere to our request to retain documents as set forth above. I look forward to your prompt response.

¹⁸ As noted, the false claims regarding dumping of ethylene oxide gas into the sewer system were also included in Mr. De Mar's February 5, 2019 story, and therefore that story must be corrected as well. See note 14, *supra*.

¹⁹ This includes CBS's anonymous sources — unless, of course, CBS intends to inform us of their identities so that we may send them a preservation notice directly.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth M. Locke, P.C.". The signature is fluid and elegant, with the initials "E.M." being particularly prominent.

Elizabeth M. Locke, P.C.



February 14, 2019

VIA ELECTRONIC DELIVERY

Honorable Richard J. Durbin
711 Hart Senate Office Building
United States Senate
Washington, D.C. 20510

Honorable Tammy Duckworth
524 Hart Senate Office Building
United State Senate
Washington, DC 20510

Honorable Sean Casten
429 Cannon House Office Building
United States House of Representatives
Washington, D.C. 20515

Honorable Bill Foster
2366 Rayburn House Office Building
United States House of Representatives
Washington, D.C. 20515

Honorable Daniel W. Lipinski
2346 Rayburn House Office Building
United States House of Representatives
Washington, D.C. 20515

Honorable Bradley S. Schneider
1432 Longworth House Office Building
United States House of Representatives
Washington, D.C. 20515

Senators and Representatives:

First, we would like to thank each of you again for taking the time to meet with us on January 29, 2019 and allowing us the opportunity to describe what Sterigenics does and how we safely operate our Willowbrook plant, explain how critical our plant is to the healthcare system, and answer the many questions each of you had.

We received your February 8, 2019 letter inquiring about the CBS Chicago "Investigative Report" concerning our Willowbrook facility and welcome the opportunity to respond to your questions. The CBS "Investigative Report" is filled with misleading and incorrect statements and represents, at best, a misinterpretation, if not an outright distortion of basic facts. We appreciate this opportunity to set the record straight.



The residents of Willowbrook have been subjected to months of misinformation regarding Sterigenics and its safe use of ethylene oxide ("EO"). The Willowbrook facility operates in compliance with regulations and has a proven record of operating safely, including voluntary actions to consistently improve performance beyond what the regulations require.

The specific questions in the February 8, 2019 letter are set forth below along with the Company's answers.

1. Do you believe there is ever a situation in which it would be appropriate to release biologically significant amounts of EtO directly into the atmosphere without going through the proper pollution control equipment? If yes, please explain. Please provide us with copies of all documents that you rely on to support this position.

Answer:

Sterigenics does not believe it is appropriate to circumvent or bypass pollution control equipment at its Willowbrook facility, and the Company vehemently rejects any suggestion that it has done so or would do so. The Sterigenics Willowbrook facility is committed to controlling EO emissions safely and in compliance with applicable regulatory permits.

The facility has operated pursuant to and in compliance with operating permits issued under the federal Clean Air Act by the Illinois EPA and its Clean Air Act Permit Program ("CAAPP") since the program's inception. Sterigenics takes its regulatory obligations very seriously, and it has not only complied with the requirements of its operating permits, but has gone beyond those requirements by installing emissions control equipment and systems that exceed the USEPA's and Illinois EPA's regulatory standards.

Today, we monitor, capture and control more than 99.9% of the EO used in the sterilization process – ***exceeding regulatory requirements and representing one of the highest control levels in the country for this industry.*** The only EO that is released directly to the atmosphere is the remaining .1%, which reflects post-control stack emissions and fugitive emissions estimates.

The CAAPP permit under which Sterigenics operates regulates emissions of ethylene oxide through application of the federal Clean Air Act's National Emissions Standards for Hazardous Air Pollutants ("NESHAP") program. See 40 C.F.R. § 63.368 (Ethylene Oxide Emissions Standards for Sterilization Facilities). Neither the USEPA nor the Illinois EPA has promulgated regulations that enforce specific maximum concentrations or levels for EO emissions in the atmosphere. Instead, the NESHAP requires the use and operation of emissions control systems that reduce emissions from the sterilization chambers and aeration rooms to an exacting level of efficiency – elimination of 99% of the EO emissions.¹

On January 30, 2006, the Illinois EPA issued modified CAAPP Permit No. 95120085 to Sterigenics for the Willowbrook facility and on June 8, 2015, the Illinois EPA renewed CAAPP permit No. 95120085. This permit includes the NESHAP for EO emissions from sterilization facilities. Neither the Sterigenics permit nor the NESHAP requires facilities to control EO emissions from backvent valves. Nonetheless, in June 2018,

¹ The NESHAP also permits an alternative limit for aeration rooms, instead of 99%. Prior testing at Willowbrook has demonstrated compliance with both alternatives.



Sterigenics voluntarily submitted a construction permit application to connect the backvents to the emission control equipment and thereby further reduce the emissions from the Willowbrook facility. On June 26, 2018, the Illinois EPA issued Permit No. 18060020 to duct the emissions of EO from the backvent valves to existing pollution control devices. Once these backvent valves became ducted, they too were subject to NESHAP's 99% control requirement.

We are emitting far below the levels allowed in the CAAPP permit and the NESHAP at our Willowbrook facility. In addition, Sterigenics reports 100% of its annual estimated emissions of EO in regulatory submissions, accounting for releases through the emission control system, as well as any fugitive emissions that are not captured by that system. Both types of emissions are expressly contemplated by and allowed pursuant to the operating permits issued by the Illinois EPA. The permits issued to Sterigenics by the Illinois EPA are available on its website, at the link [here](#). The regulatory reports regarding these emissions are publicly available [here](#) and at the bottom of the page [here](#).

During its webinar on February 5, 2019 to discuss recent air sample results in Willowbrook, the USEPA stated that "it remains premature to draw conclusions about long-term health risks" from EO emissions from the Sterigenics facility. Further, the EPA indicated that amounts of EO recently being measured are "extremely low levels in the atmosphere...part per billion and part per trillion numbers and it doesn't take very much of this material or any material to cause those kinds of levels in the air."

Finally, while USEPA's work continues, its most recent sampling shows average EO levels in residential areas in Willowbrook that are in line with general background levels of EO across the Chicago area and other parts of the country.

2. Do you believe there is ever a situation in which it would be appropriate to dump ethylene glycol into drainage facilities instead of its proper collection process? If yes, please explain.

Answer:

Sterigenics believes that disposal of ethylene glycol always should be done properly and has not illegally "dumped" ethylene glycol into drainage facilities or public sewer systems in violation of any applicable regulations and any accusations to the contrary are simply false.

According to current DuPage County wastewater rules, it is permissible to discharge treated ethylene glycol to the sanitary sewer system so long as the discharge is coordinated with the local sewer district and the glycol is within a certain pH range. See DuPage County Code, Chapter 36. These regulations have been in effect for decades. Prior to the purchase of the Willowbrook facility in 1999 by Sterigenics' predecessor, it is our understanding that ethylene glycol periodically was disposed of through the sanitary sewer system in a manner consistent with these regulations. We understand that the local sanitary sewer district was notified of these authorized discharges, and the Willowbrook facility complied with local ordinances regarding them. Currently, Sterigenics has chosen a recycling option whereby the ethylene glycol is sold to a manufacturer as a byproduct. This recycling avoids the need to burden the sewer treatment plant with additional waste.

Sterigenics did experience an accidental release of ethylene glycol in 2013 and one very minor one in late 2018. The 2013 release was cleaned up and the Company obtained a No Further Remediation letter for all affected property. The same process is ongoing now for the minor 2018 release. Finally, we note that recent testing by the Illinois EPA in late 2018 found no evidence of EO or ethylene glycol in local water wells, confirming that the Willowbrook facility has had no impact on local well water.



3. Do you maintain a record of monitor alarm occurrences from EtO at the facility, and does an EtO alarm alert have to be reported to federal or state authorities? How many times have these monitors been triggered since 1993? If so, provide us with copies of these records from 1993 to present day.

- a. Does an EtO alarm alert have to be reported to federal or state authorities? If so, please provide us with copies of all documents submitted in connection with those reports from 1993 to present day.**
- b. How many times have these monitors been triggered since 1993? Please provide us with a complete list of the exact dates on which the monitors were triggered.**

Answer:

Our voluntary monitoring systems were put into place to provide real-time alerts to our employees of EO levels. This question implies that alarms being "triggered" is an indication of problematic EO exposure issues inside the Willowbrook facility, and that is not necessarily correct.

We have in effect three internal monitoring systems, all of which are designed for employee safety and monitor air within the facility. The three systems are a Gas Chromatography ("GC") monitoring system, a Lower Explosive Level ("LEL") monitoring system, and a personal monitoring (commonly referred to as a "badge") system. The only regulatorily-required system is the personal monitoring system, which is required by OSHA. Our GC and LEL monitoring programs are not required by any regulatory authority, exceed OSHA requirements, and are part of a system that our company voluntarily installed for protection of employee safety inside our building. Accordingly, we are not required to report to any state or federal authorities on these voluntary monitoring systems.

The GC system monitors levels of EO concentrations inside the Willowbrook facility. The system cycles through different monitoring locations (known as "ports") continuously at all hours of every day in order to assist with employee safety. The system is connected to a set of stacked lights (green, yellow, and red) and audible sounds that alert employees to the EO levels in the areas of the corresponding port. Employees use the system to determine when to don personal protective equipment and to inform responsive actions.

The LEL system is designed to measure EO concentrations continuously and to detect significant changes in EO concentration in different areas of the facility that would be an indication of a potential leak of EO. The LEL sensors measure, in percentage terms, the EO concentration compared to the lower flammable or explosive limit of EO. The LEL system conveys information using the same stacked lights and audible alert system that the GC system is connected to.

In 2018, a facility evacuation in Willowbrook 1 or Willowbrook 2 occurred seven times because of high LEL sensor readings. In each case, these were determined to be false alerts caused by faulty LEL sensors. As with any sensor, there can be false readings due to "drift" within the electronic sensors, faulty sensors or circuit boards, or moisture on the sensor. Sterigenics nevertheless requires that its safety procedures are followed until a reading is demonstrated to be false. Again, safety is Sterigenics' paramount concern.

We have 56 total GC and LEL sensors in our Willowbrook 1 facility, and 31 total GC and LEL sensors in our Willowbrook 2 facility. These sensors provide complete facility coverage as well as redundancy.

4. **What is the protocol for employees and facility management when an EtO alarm sounds, whether it be from a personal exposure alarm or a facility-wide alarm? Please provide us with copies of all documents memorializing or interpreting this protocol.**

Answer:

As noted above, our GC and LEL monitoring systems communicate to employees the levels of EO in a given indoor area through colored lights and audible alarms, as well as through panel displays that provide numerical EO readings. Employees are extensively trained on the steps to take in response to these readings. If the EO reading in a particular indoor location is below 1 ppm (the OSHA 8-hour permissible exposure limit ("PEL")), the area monitoring system will display a green light, indicating that it is safe for workers to be in the area. Employees are trained to evaluate whether to use personal protective equipment if EO levels equal or exceed 1 ppm, and are trained to don personal protective equipment if EO levels equal or exceed 3 ppm. Regarding the LEL system, if the LEL sensor reads above 25% of the LEL then the system displays a red flashing light, a constant audible alarm sounds throughout the facility, and a plant evacuation is required.

We are uncertain as to what your question about "personal exposure alarms" is referring. We are unaware of any such alarms. The GC and LEL sensors are stationary, whereas personal monitoring badges are designed to be worn by an individual employee throughout the plant and record the amount of EO to which the employee may be exposed. Personal monitoring is performed by attaching a badge (which is a sampling device) to the employee's clothing to test airborne EO concentrations regardless of where the employee moves in the workplace. Personal monitoring is done on a quarterly basis. Samples are collected for 15 minutes to test short-term exposure and for an 8-hour period to test for average exposures over a time-weighted 8-hour period as required by OSHA. These samples are sent to a third-party laboratory for analysis. See, e.g., U.S. Department of Labor, *Ethylene Oxide (EtO): Understanding OSHA's Exposure Monitoring Requirements*, https://www.osha.gov/Publications/ethylene_oxide.html.

The GC, LEL, and personal monitoring systems all exist to assist our employees in avoiding elevated concentrations of EO and all measure EO levels within the facility, not of emissions outside the facility. We take the safety of our employees very seriously. We would not tolerate any manipulation of these systems in a manner inconsistent with our commitment to employee safety, and we are not aware of any such instances.

5. **Please provide us with a detailed description of past incidents at the Sterigenics Willowbrook facility where Sterigenics bypassed pollution control equipment and released EtO directly into the atmosphere.**

Answer:

All of the EO emissions from the sterilization chambers, backvents and aeration rooms at the Willowbrook facilities are sent directly to emission control devices. ***Sterigenics does not allow these devices to be bypassed.***

The facility experienced a malfunction of its pollution control systems, which resulted in an uncontrolled release of a small volume of EO, on October 7, 2013. This 12-pound release was reported to the Illinois EPA, and the Company paid a fine and settled the claim by the State of Illinois. There are detailed requirements under federal law for reporting releases of EO releases to federal, state and local authorities, and Sterigenics complies with these laws. ***With the exception of this one incident, Sterigenics has not had a reportable release of EO from its Willowbrook facility since Sterigenics' predecessor purchased the facility in 1999.***

6. Please provide us with a detailed explanation on why the alleged actions referenced above in (5) are false or why such actions occurred but were appropriate.

Answer:

See the response to 5 above.

7. Please provide us with all documents relating to incidents involving the direct release of EtO into the atmosphere at the Sterigenics Willowbrook facility.

Answer:

We are unsure what is meant by “direct release” as used in this question. Sterigenics’ operating permits allow the release into the atmosphere of a certain small percentage of the EO used annually in sterilization processes. These permitted emissions occur after the EO is captured and processed by the emissions control equipment in accordance with the NESHAP standards and Sterigenics’ operating permits, and also through small permitted amounts of fugitive emissions. Both types of emissions are allowed pursuant to the operating permits issued by the Illinois EPA. Permits are available on Illinois EPA’s website, available [here](#). Regulatory submissions regarding these emissions are also publicly available at the links provided above in response to Question 1. ***As noted above, with the one exception of the equipment malfunction in 2013, Sterigenics has not experienced an exceedance of any EO emissions limits.*** Documents regarding the 2013 incident are available [here](#).

* * *

As the only method approved by the Food and Drug Administration (“FDA”) to sterilize millions of critical medical devices, EO sterilization protects individuals needing medical care from life-threatening infection. On an average day, the Willowbrook facility sterilizes 1,000 cardiac devices used in heart surgery, 1,000 knee implants, 1,500 surgical procedure kits, 16,000 catheters, 11,000 syringes for injections used in radiology diagnosis, and thousands of diabetes monitoring and care kits, renal care products, neurosurgical devices, and respiratory care products.

There is no viable alternative for sterilizing these devices. Indeed, for numerous important FDA-approved medical devices, EO sterilization is the only method approved by FDA for ensuring sterility. What many do not understand is that an FDA-required sterilization method for these devices cannot be simply shifted to another technology or another facility. To ensure consistent, reliable removal of pathogens, sterilization processes are validated to a specific technology and, often times, a particular chamber at a specific facility. Accordingly, if the Willowbrook facility were not in operation, ***tens of thousands of patients each day*** would be forced to go without the medical procedures they need. By complying with and going above and beyond what the regulations require, the Willowbrook facility safely uses EO and provides a vital service to patients in Illinois and across the country.

Again, thank you for the opportunity to respond to the gross factual distortions and misleading claims in the “CBS Investigative Report.” We would welcome the opportunity to receive you or your staff for a tour of our facility and further discuss any of the responses in this letter. We would be happy to coordinate a time at your convenience.



Sincerely,

A handwritten signature in black ink, appearing to read "Philip Macnabb".

Philip Macnabb
President, Sterigenics U.S., LLC

Message

From: Jennifer McConahy Personal Address / Ex. 6
Sent: 2/14/2019 10:37:54 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Time's up, EPA. Solve the Sterigenics problem. - Chicago Tribune

Time's up, EPA. Solve the Sterigenics problem. - Chicago Tribune

<https://www.chicagotribune.com/news/opinion/editorials/ct-edit-sterigenics-epa-air-pollution-cancer-20190214-story.html>

Message

From: Christian, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=64A0F5E0E9D94271B23CAD28DB653851-LIZOTTE, ME]
on behalf of Orme-Zavaleta, Jennifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3C5A111DC377411595E5B24B5D96146B-ORME-ZAVALITA, JENNIFER]
Sent: 2/14/2019 9:09:53 PM
To: Weekly Report Group [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0f8a89464c5e435c87b7375ffe506c1a-Weekly Repo]
CC: Hubbard, Carolyn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2a93ce3245494318b109e87f7d826284-Hubbard, Carolyn]; Blackburn, Elizabeth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a080eb90549a453aaa6a357f5257c0b7-Blackburn, Elizabeth]; Rodan, Bruce [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Rodan, Bruce]; Radzikowski, Mary Ellen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2ac0a54e43bb4ac08276b57c5563c725-Radzikowski, Mary Ellen]; Robbins, Chris [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=958b4b78eb42457eacf53514e428efd6-Robbins, Chris]; Breen, Barry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1b44bce1a71e4a95acaf82f2fbc858b0-BBREEN]; Dunham, Sarah [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a9444681441e4521ad92ae7d42919223-SDUNHAM]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Walker, Mary [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Mary S.]; Forsgren, Lee [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a055d7329d5b470fbaa9920ce1b68a7d-Forsgren, D]; Nishida, Jane [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=65e465e683c54e1b825f1bad32dcb099-Nishida, Jane]; Servidio, Cosmo [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f11f91d53e9a4cdaa8281be07e9034aa-Servidio, C]; Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]; Gulliford, Jim [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a3aa23ac3a36426495575d5dfd5a37c9-Gulliford,]; Lopez, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7b64b3b2f984708840a5f342309d460-Lopez, Pete]; Wagner, Kenneth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=048236ab99bc4d5ea16c139b1b67719c-Wagner, Ken]; Darwin, Henry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7ae8e9d24eeb4132b25982e358efbd9d-Darwin, Hen]; Bodine, Susan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8c2cc6086fcc44c3be6b5d32b262d983-Bodine, Sus]; Ross, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e062a18f48f1455295deebfb9bf7a30d-Ross, David]; Stepp, Cathy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=befdafc0fa1a425eae232f60ad9bda1d-Stepp, Cath]; Idsal, Anne [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b1beca8121fb47a08e82b6bf2247a79b-Idsal, Anne]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Sauerhage, Maggie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b13c7152d704546b40a91220914d3cc-Sauerhage,]; Dunlap, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=591eb15a268249dda0c05a7451f765c3-Dunlap, Dav]
Subject: ORD Weekly Report February 14
Attachments: ORD weekly Update February 14.docx

Administrator,

I'm pleased to share that we received the 2018 report for EPA for Feds Feeds Families, and EPA contributed the most for a small agency. It was a successful campaign and cross-agency effort. Today, we welcomed the European Union delegation to our labs in RTP, NC, and supported the rollout of the PFAS management plan.

Hot issues

Deliberative Process / Ex. 5

Message

From: Jennifer McConahy [Personal Address / Ex. 6]
Sent: 2/20/2019 12:50:29 PM
To: Wheeler, Andrew [wheeler.andrew@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Lewis, Josh [Lewis.Josh@epa.gov]
Subject: Lake County residents push Trump, Pritzker EPAs for protection from same cancer-causing gas that shut down Sterigenics - Chicago Tribune

Lake County residents push Trump, Pritzker EPAs for protection from same cancer-causing gas that shut down Sterigenics - Chicago Tribune

<https://www.chicagotribune.com/news/local/breaking/ct-met-ethylene-oxide-cancer-waukegan-gurnee-20190218-story.html>

Message

From: Radvyda [Personal Address / Ex. 6]
Sent: 2/18/2019 3:08:50 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: The Sterigenics clampdown: As U.S. EPA fiddles, Illinois EPA acts - Chicago Tribune

Time's up!! Actually time was up the day Sterigenics opened here in 1984.
Or in 2017 December when Sterigenics and Rauner were informed , but not Willowbrook folks. Now is February, 2019 - What has been done since December, 2017 by Us Epa- Only 3 month every 3 days of emission readings.

It's not leaky furnaces poisoning people here. We are not that stupid to trust Sterigenics or even Us Epa.

Thank you IEPA!! Thank you Stop Sterigenics! Thank you Willowbrook village!

<https://www.chicagotribune.com/news/opinion/editorials/ct-edit-sterigenics-epa-illinois-pritzker-20190217-story.html>

Willowbrook resident who will be forever afraid what health wise the future brings to my family
Sent from Radvydos iPhone

Message

From: Jennifer McConahy Personal Address / Ex. 6
Sent: 2/18/2019 1:17:19 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Wheeler, Andrew [wheeler.andrew@epa.gov]; Lewis, Josh [Lewis.Josh@epa.gov]
Subject: The Sterigenics clampdown: As U.S. EPA fiddles, Illinois EPA acts - Chicago Tribune

The Sterigenics clampdown: As U.S. EPA fiddles, Illinois EPA acts - Chicago Tribune

<https://www.chicagotribune.com/news/opinion/editorials/ct-edit-sterigenics-epa-illinois-pritzker-20190217-story.html>

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 2/28/2019 9:57:19 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.clint@epa.gov]
CC: 'Macnabb, Philip (PMacnabb@sterigenics.com)' [PMacnabb@sterigenics.com]
Subject: FDA Announcement: Impact on Medical Supplies of Sterigenics' Willowbrook Shutdown
Attachments: sterigenics - fda news release feb 27 19.DOCX

Bill / Cliff – I wanted to make sure you were aware of this.

Let me know if you have any questions. Thanks.

Tom Roberts | Partner

VanNess Feldman LLP

1050 Thomas Jefferson Street, NW
Washington, DC 20007

(202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com

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CDRH Message: Medical Devices Supply Issue and Potential Shortages as Sterigenics Willowbrook Product Sterilization Facility Ceases Operations

Supply issues can lead to shortages of medical devices—and can pose a threat to public health by delaying or disrupting critical care for patients. Mitigating product supply issues and working to prevent patient harm from device shortages are important to the U.S. Food and Drug Administration (FDA).

The FDA's Center for Devices and Radiological Health (CDRH) is aware that on February 15, 2019, the Illinois Environmental Protection Agency (EPA) [issued a Seal Order](#) to stop the Sterigenics facility in Willowbrook, Illinois, from sterilizing medical products and other products with ethylene oxide. [Learn more about the Environmental Protection Agency's assessment of Sterigenics Willowbrook Facility on EPA.gov.](#)

Medical devices account for over 90 percent of the products that the Sterigenics Willowbrook facility sterilizes. The FDA is reaching out to medical device manufacturers to understand which manufacturers are affected by the cessation of operations at this sterilization facility. At this time, the FDA believes that more than 100 manufacturers and hundreds of devices may be affected.

Currently, the FDA is not aware of any device shortages. In case of a potential shortage, the FDA identifies strategies that will limit or mitigate patient impact due to device supply interruptions. The FDA also reaches out to device manufacturers who might not be affected by an issue to determine their availability to ramp up production and potentially mitigate a shortage.

Report Sterilization Site Changes to the FDA

- **Premarket Approval (PMA) Holders:** If you are a PMA holder affected by the cessation of operations at the Sterigenic's Willowbrook facility and you are planning to use an alternative facility to sterilize your products, you should submit a 180-day site change supplement. However, the FDA intends to review such PMA supplements within 30 days. The FDA recently issued the final guidance, [Manufacturing Site Change Supplements: Content and Submission](#), that PMA holders can refer to for more information about site change supplements. If you have questions about your

PMA device or need help with submitting a site change supplement, contact CDRHPremarketProgramOperations@fda.hhs.gov.

- **510(k) Holders:** If you are a 510(k) holder affected by the Sterigenic's Willowbrook facility shutdown and you are planning to use an alternative ethylene oxide sterilization facility, submitting a new 510(k) is typically not required. You should document qualification activities supporting this change in your internal files. However, the FDA recommends that affected 510(k) holders refer to the FDA's guidance, [Deciding When to Submit a 510\(k\) for a Change to an Existing Device: Guidance for Industry and Food and Drug Administration Staff](#) when determining if a new 510(k) is required.

Report a Medical Product Supply Issue or Shortage

Planning for and preventing device supply shortages is an important responsibility. The FDA can help anticipate, prevent or mitigate future shortages by working with device manufacturers that voluntarily provide us with information on potential product supply issues. [Learn more about how to report a medical product shortage or supply issue.](#)

Questions?

If you have questions about medical device supply issues or shortages, contact Deviceshortages@fda.hhs.gov.



U.S. Food and Drug Administration
10903 New Hampshire Avenue, Silver Spring, MD 20993
1-888-INFO-FDA (1-888-463-6332)

Message

From: Jennifer McConahy Personal Address / Ex. 6
Sent: 2/14/2019 2:16:49 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Attachments: 19.02.13 - Wheeler Sterigenics.pdf

Message

From: Jennifer McConahy [Personal Address / Ex. 6]
Sent: 2/14/2019 2:16:10 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Members Of Congress Call For Criminal Probe Into Sterigenics Following CBS 2 Investigation – CBS Chicago

Members Of Congress Call For Criminal Probe Into Sterigenics Following CBS 2 Investigation – CBS Chicago

<https://chicago.cbslocal.com/2019/02/13/sterigenics-willowbrook-criminal-probe-ethylene-oxide/>

Message

From: Macnabb, Philip [PMacnabb@sterigenics.com]
Sent: 2/13/2019 11:44:24 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Fwd: Quick call

Sorry

Hit send before I was finished...

Want to give you a heads up on a strategy we are pursuing this Friday.

Thanks

Sent from my iPhone

Begin forwarded message:

From: PMacnabb@sterigenics.com
Date: February 13, 2019 at 5:41:40 PM CST
To: Wehrum.Bill@epa.gov
Subject: Quick call

Bill

Let me know if you have a few minutes tonight or tomorrow for a brief call. I want to give you a heads up on a path we are pursuing this fr

Sent from my iPhone

This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Message

From: Petras, Jr., Michael [mpetras@soterahealth.com]
Sent: 2/8/2019 5:45:03 PM
To: Wheeler, Andrew [wheeler.andrew@epa.gov]
CC: Wehrum, Bill [Wehrum.Bill@epa.gov]; Molina, Michael [molina.michael@epa.gov]
Subject: Sterigenics Information
Attachments: Sterigenics Response to Dave Savini CBS_020119.pdf

Mr. Wheeler,

I understand that Senator Durbin has reached out to you recently about our business, Sterigenics, including references to a CBS News story. I thought you should see the attached.

As always, my team or I are available to answer any questions you may have. We continue to be committed to transparency throughout this situation.

Thank you

Michael

Michael B. Petras, Jr.
Chief Executive Officer
Sotera Health LLC
9100 South Hills Blvd., Suite 300
Broadview Heights, OH 44147
mpetras@soterahealth.com
Direct: 440-262-1420



This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Sterigenics' Statement Upon Request to Dave Savini, CBS Chicago

February 1, 2019

We want to set the record straight with regard to the allegations raised in your email to Sterigenics dated January 30 and your subsequent conversation with Kristin Gibbs on January 31, which appear to arise from materials submitted in the litigation by attorneys representing individuals who have sued us. These plaintiffs' claims are designed for the sole purpose of moving the cases to Cook County court. In light of the ongoing litigation involving Sterigenics, we have provided a statement with our responses below.

The claims you cite are misleading and untrue and represent a clear distortion of the facts regarding Sterigenics' operations. We will vigorously defend ourselves against these allegations in court.

The residents of Willowbrook have been subjected to months of misinformation regarding Sterigenics and its safe use of ethylene oxide (EO) in the sterilization of vital medical products – including the reliance on unrealistic risk standards and flawed air sampling by the EPA.

Sterigenics Willowbrook operates in compliance with regulations and has a proven record of operating safely since it acquired the facility in 1999, including voluntary actions to consistently improve operations to outperform what the regulations require.

EO is the only method approved by the Food and Drug Administration ("FDA") to sterilize millions of critical medical devices. Without sterilization of these devices, individuals needing medical care would face life-threatening infection. By complying with and going above and beyond what the regulations require, the Sterigenics Willowbrook facility safely uses EO and provides a vital service to patients in Illinois and across the country.

In terms of the specific topics raised in your email and subsequent conversation, we offer the following responses:

- "allegations of dumping waste into the sewer system at the Willowbrook locations"
 - These allegations date back more than twenty years ago, and mischaracterize an authorized process of discharging certain waste materials into the sanitary sewer for treatment at municipal waste treatment facilities. This process was not only authorized but also permitted by, and disclosed to, the local sanitation district.
 - Notably, these waste materials were not EO – the facility treated EO emissions through its dedicated EO controls at this time. Additionally, these materials were not discharged to municipal water supplies. Furthermore, recent testing of wells in Willowbrook found no evidence of EO in the water as predicted.
 - Our control equipment produces ethylene glycol as it reduces air emissions. Ethylene glycol is commonly used in automobile antifreeze and to de-ice airplanes. The release of

ethylene glycol into the sanitary sewer for further treatment is similar to what transpires in the de-icing activity that takes place at O'Hare and other airports across the country on any given winter day. The ethylene glycol used likely flows safely into public treatment systems after application to airplanes.

- Under current DuPage County Wastewater rules, the release of ethylene glycol into the public sanitation sewer system continues to be permissible, although Sterigenics no longer uses that method of discharge. Today, ethylene glycol is safely recycled at the Sterigenics facility.
- “ethylene oxide was allowed to be vented through overhead doors and other ways other than through scrubbers.”
 - This is misleading. There was no “venting” of EO to the outside as part of the facility’s emissions controls. The sterilization chambers, which are where EO processing takes place, are connected to the scrubbers for emissions control. After sterilization, product is moved out of the chambers and through the facility. EO levels are monitored throughout these areas.
 - The Willowbrook facility’s state-of-the-art systems safely control and contain EO. Today, less than 1/10th of 1% of the EO used in the sterilization process is released into the atmosphere – exceeding regulatory requirements and representing one of the highest control levels in the country for this industry.
- “allegations that warning monitors for workers were compromised.”
 - We have found no evidence to support this claim. Sterigenics is committed to employee safety, and maintenance on monitoring systems is performed regularly to ensure the monitors function properly.
 - Sterigenics has invested significant resources to upgrade its systems and install state-of-the-art systems that allow the company’s employees to safely monitor, capture and control more than 99.9% of the EO used in the sterilization process – exceeding regulatory requirements.
- “numerous other warehouses in Willowbrook and Burr Ridge used to store product that was off-gassing.”
 - Products are not stored in warehouses for off-gassing. Upon removal from the sterilization chambers, products are stored in special, controlled rooms that are under negative pressure, meaning the air flows in and not out. Emissions from these rooms are also routed to emission controls. This is the FDA-approved procedure for ensuring that medical equipment remains sterile for important life-saving medical procedures.



Worker safety, in addition to the safety of the community and patients we serve, is paramount at Sterigenics. Workers follow strict regulatory guidelines regarding the safe handling and usage of EO in the sterilization process and are provided with the necessary safety equipment based on their role and position in the facility. We are proud of our safety record at the Willowbrook facility.

We are committed to ensuring the public has the facts regarding Sterigenics and EO. The claims you have referenced – which are similar to claims made by plaintiffs who have sued Sterigenics and are currently seeking to move the cases to Cook County court – are misleading and untrue distortions of the facts regarding Sterigenics' operations.

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 2/8/2019 12:30:06 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: action items

Bill,

Deliberative Process / Ex. 5

Begin forwarded message:

From: "Koerber, Mike" <Koerber.Mike@epa.gov>
Date: February 7, 2019 at 7:26:26 PM EST
To: "Tsirigotis, Peter" <Tsirigotis.Peter@epa.gov>, "Woods, Clint" <woods.clint@epa.gov>, "Wehrum, Bill" <Wehrum.Bill@epa.gov>, "Harlow, David" <harlow.david@epa.gov>
Subject: Fwd: action items

Here's a summary of the action items.

Sent from my iPhone

Begin forwarded message:

From: "Siegel, Kathryn" <siegel.kathryn@epa.gov>
Date: February 7, 2019 at 7:19:19 PM EST
To: "Koerber, Mike" <Koerber.Mike@epa.gov>, "Nam, Ed" <nam.ed@epa.gov>
Cc: "Rountree, Jillian" <Rountree.Jillian@epa.gov>
Subject: action items

Hi Mike and Ed,

Please find a summary of action items below:

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Katie Siegel, Chief
Air Toxics and Assessment Branch
Air and Radiation Division
U.S. EPA Region 5
siegel.kathryn@epa.gov
(312) 886-3006

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 2/1/2019 4:27:00 PM
To: Molina, Michael [molina.michael@epa.gov]
CC: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Follow Up to Sterigenics Meeting -- AdvaMed EtO Letter.pdf
Attachments: AdvaMed EPA EtO Letter.pdf; ATT00001.txt

Michael - it was good to meet you the other day.

In our meeting, Acting Administrator Wheeler asked whether Sterigenics had received any help or support from our customers in the medical community for whom we provide sterilization services. Our answer was "very little".

In that regard, I wanted to bring your attention to the attached letter from AdvaMed to Acting Administrator Wheeler from last September. AdvaMed is a trade association representing many manufacturers of medical devices, diagnostic products, and health information systems.

I am sure this letter is in the EPA system somewhere, but in light of the Acting Administrator's inquiry thought we would flag it for you.

If you have any questions, please contact me.

Thank you.

Tom Roberts | Partner
Van Ness Feldman LLP

1050 Thomas Jefferson Street, NW
Washington, DC 20007
(202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com

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Message

From: Gentry, Nathan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A8F7A2857A234D06B785CC36C73FDDDD-GENTRY, NATHAN]
on behalf of Orme-Zavaleta, Jennifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3C5A111DC377411595E5B24B5D96146B-ORME-ZA VALETA, JENNIFER]
Sent: 2/7/2019 4:37:02 PM
To: Weekly Report Group [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0f8a89464c5e435c87b7375ffe506c1a-Weekly Repo]
CC: Hubbard, Carolyn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2a93ce3245494318b109e87f7d826284-Hubbard, Carolyn]; Blackburn, Elizabeth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a080eb90549a453aaa6a357f5257c0b7-Blackburn, Elizabeth]; Rodan, Bruce [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Rodan, Bruce]; Radzikowski, Mary Ellen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2ac0a54e43bb4ac08276b57c5563c725-Radzikowski, Mary Ellen]; Robbins, Chris [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=958b4b78eb42457eacf53514e428efd6-Robbins, Chris]; Breen, Barry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1b44bce1a71e4a95acaf82f2fbc858b0-BBREEN]; Dunham, Sarah [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a9444681441e4521ad92ae7d42919223-SDUNHAM]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Glenn, Trey [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1f10fec3149420597e6581c2586e25e-Glenn, Onis]; Forsgren, Lee [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a055d7329d5b470fbaa9920ce1b68a7d-Forsgren, D]; Nishida, Jane [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=65e465e683c54e1b825f1bad32dcb099-Nishida, Jane]; Servidio, Cosmo [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f11f91d53e9a4cdaa8281be07e9034aa-Servidio, C]; Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]; Gulliford, Jim [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a3aa23ac3a36426495575d5dfd5a37c9-Gulliford,]; Lopez, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7b64b3b2f984708840a5f342309d460-Lopez, Pete]; Wagner, Kenneth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=048236ab99bc4d5ea16c139b1b67719c-Wagner, Ken]; Darwin, Henry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7ae8e9d24eeb4132b25982e358efbd9d-Darwin, Hen]; Bodine, Susan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8c2cc6086fcc44c3be6b5d32b262d983-Bodine, Sus]; Ross, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e062a18f48f1455295deebfb9bf7a30d-Ross, David]; Stepp, Cathy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=befdafc0fa1a425eae232f60ad9bda1d-Stepp, Cath]; Idsal, Anne [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b1beca8121fb47a08e82b6bf2247a79b-Idsal, Anne]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Sauerhage, Maggie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b13c7152d704546b40a91220914d3cc-Sauerhage,]; Dunlap, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=591eb15a268249dda0c05a7451f765c3-Dunlap, Dav]
Subject: ORD Weekly Update for February 7
Attachments: ORD weekly Update February 7.docx

Administrator,

This week, ORD's senior leadership met with Henry Darwin in RTP, NC in preparation to deploy our EPA Lean Management System (ELMS) in March. Henry also held a very well attended all-hands meeting and shared a wealth of information with RTP staff.

We are looking forward to hosting you and the European Union delegation next week in RTP to discuss chemical testing and PFAS research, in addition to other topics.

Hot issues

Deliberative Process / Ex. 5

Sterigenics facility visit re: Ethylene Oxide (EtO), Charlotte, NC, February 12.

To inform our research in support of OAR and the regions on instrumentation and methods development for improving Ethylene Oxide (EtO) detection limits, ORD and OAR will visit a Sterigenics facility in Charlotte, NC, which provides ethylene oxide sterilization services. The visit will include a facility tour plus information and detail as to how the facility operates.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Jennifer Orme-Zavaleta, PhD

Principal Deputy Assistant Administrator for Science

Office of Research and Development

US Environmental Protection Agency

Cell 919-699-1564

DC 202-564-6620

RTP 919-541-2283

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 2/6/2019 2:29:25 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.clint@epa.gov]
Subject: Sterigenics - CBS Story
Attachments: Sterigenics Response to Dave Savini CBS_02_01_19.pdf

Bill / Clint -- we noted that you fielded a question yesterday about the CBS piece that ran Sunday night. Attached is a rebuttal / response that Sterigenics sent to the reporter before the story ran. Bottom line, most of the allegations of the former employee are false.

Thank you.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Gibbs, Kristin [mailto:kgibbs@soterahealth.com]
Sent: Monday, February 04, 2019 6:12 PM
To: Tom Roberts; Binninger, Declan J.
Subject: Final Statement to CBS Reporter

Here is the statement that we sent to the reporter on Friday evening.

The reporter did post this entire document on the local CBS.com site.

This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Message

From: Macnabb, Philip [PMacnabb@sterigenics.com]
Sent: 1/28/2019 5:12:30 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Re: [EXTERNAL] RE: Call

Sure

I will call at 5:30

Sent from my iPhone

> On Jan 28, 2019, at 12:08 PM, Wehrum, Bill <Wehrum.Bill@epa.gov> wrote:
>
> CAUTION: This email originated from outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.
>
> I will be up on the Hill with Wheeler at that time. Are you available at 5:30? If so, please call 202 424 0654. Thanks.
>
>
> _____
> Bill Wehrum
> Assistant Administrator
> Office of Air and Radiation
> U.S. Environmental Protection Agency
> (202) 564-7404
>
> -----Original Message-----
> From: Macnabb, Philip <PMacnabb@sterigenics.com>
> Sent: Monday, January 28, 2019 12:07 PM
> To: Wehrum, Bill <Wehrum.Bill@epa.gov>
> Subject: Call
>
> Bill
>
> Are you still available for a call today, 4pm EST. If so, what number should I use?
>
> Thanks
>
> Sent from my iPhone
> This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.
> This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Message

From: Eby, Natasha [eby.natasha@epa.gov]
Sent: 1/28/2019 3:11:36 PM
To: tcr@vnf.com
CC: Humphreys, Hayly [humphreys.hayly@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Woodward, Cheryl [Woodward.Cheryl@epa.gov]
Subject: RE: Request to Meet with Acting Administrator Wheeler

Hi Tom,

I have copied my colleague Cheryl Woodward for arrival instructions. Thank you!

Natasha Y. Eby
Special Assistant to the Administrator
Office of the Administrator
U.S. Environmental Protection Agency

From: Tom Roberts <tcr@vnf.com>
Sent: Monday, January 28, 2019 10:03 AM
To: Eby, Natasha <eby.natasha@epa.gov>
Cc: Humphreys, Hayly <humphreys.hayly@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>
Subject: RE: Request to Meet with Acting Administrator Wheeler

Natasha – I assume we enter the building at the entrance on 12th by the Metro escalator. Is that correct? Thank you.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Eby, Natasha [<mailto:eby.natasha@epa.gov>]
Sent: Thursday, January 24, 2019 2:49 PM
To: Tom Roberts
Cc: Humphreys, Hayly; Wehrum, Bill
Subject: RE: Request to Meet with Acting Administrator Wheeler

No worries! Thank you for confirming. We will see you next week.

Natasha

From: Tom Roberts <tcr@vnf.com>
Sent: Thursday, January 24, 2019 2:48 PM
To: Eby, Natasha <eby.natasha@epa.gov>
Cc: Humphreys, Hayly <humphreys.hayly@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>
Subject: Re: Request to Meet with Acting Administrator Wheeler

Yes. 10:45. Sorry about that.

Sent from my iPhone

On Jan 24, 2019, at 2:28 PM, Eby, Natasha <eby.natasha@epa.gov> wrote:

Hi Tom,

I just want to clarify. Did you mean 10:45 below? Thanks!

Natasha

From: Tom Roberts <tcr@vnf.com>
Sent: Thursday, January 24, 2019 2:25 PM
To: Eby, Natasha <eby.natasha@epa.gov>
Cc: Humphreys, Hayly <humphreys.hayly@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>
Subject: Re: Request to Meet with Acting Administrator Wheeler

Natasha - We are confirmed for 10:15 on Tuesday, January 29. I will send the names of the Sterigenics attendees when I get back to my desk. Do you need any additional information?

Thank you.

Sent from my iPhone

On Jan 24, 2019, at 1:43 PM, Eby, Natasha <eby.natasha@epa.gov> wrote:

Hi Tom,

I work with Hayly and happy to help with your request below. The Acting Administrator has limited availability for Tuesday, January 29. Are you able to make 10:45 – 11:15 AM work? Just let us know. Thank you!

Natasha Y. Eby
Special Assistant to the Administrator
Office of the Administrator
U.S. Environmental Protection Agency

From: Tom Roberts <tcr@vnf.com>
Sent: Thursday, January 24, 2019 12:29 PM
To: Humphreys, Hayly <humphreys.hayly@epa.gov>
Cc: Wehrum, Bill <Wehrum.Bill@epa.gov>; Eby, Natasha <eby.natasha@epa.gov>
Subject: RE: Request to Meet with Acting Administrator Wheeler

Hayly – we just have been offered a meeting with Senator Durbin for late on Tuesday, January 29. Is there any way we could meet with Acting Administrator Wheeler on Tuesday? Thanks.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Humphreys, Hayly [<mailto:humphreys.hayly@epa.gov>]
Sent: Thursday, January 24, 2019 11:13 AM
To: Tom Roberts
Cc: Wehrum, Bill; Eby, Natasha
Subject: RE: Request to Meet with Acting Administrator Wheeler

Hi Tom,

Unfortunately, the Acting Administrator is only available from 11:15AM to 11:45AM.
Apologies I did not specify in my earlier email.

Best,
Hayly

Hayly Humphreys
Office of the Administrator
U.S. EPA

From: Tom Roberts <tcr@vnf.com>
Sent: Thursday, January 24, 2019 11:08 AM
To: Humphreys, Hayly <humphreys.hayly@epa.gov>
Cc: Wehrum, Bill <Wehrum.Bill@epa.gov>; Eby, Natasha <eby.natasha@epa.gov>
Subject: Re: Request to Meet with Acting Administrator Wheeler

Hayly - we can do 11:15 on Monday. Ideally we would like an hour but I understand the constraints. Could we plan for at least 45 minutes?

Thank you.

Sent from my iPhone

On Jan 24, 2019, at 9:50 AM, Humphreys, Hayly <humphreys.hayly@epa.gov> wrote:

Hi Tom,

Would Monday at 11:15AM be possible?

Thanks!

Hayly Humphreys
Office of the Administrator
U.S. EPA

From: Tom Roberts <tcr@vnf.com>
Sent: Wednesday, January 23, 2019 5:02 PM
To: Humphreys, Hayly <humphreys.hayly@epa.gov>
Cc: Wehrum, Bill <Wehrum.Bill@epa.gov>; Eby, Natasha <eby.natasha@epa.gov>
Subject: RE: Request to Meet with Acting Administrator Wheeler

Hayly -- we can meet on Monday the 28th. Did you have a particular time in mind? Since the clients will be flying in from Cleveland, sometime after 11:00 am would work well for us. If the only available time is earlier than that, they will have to come in the night before.

Thank you.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Humphreys, Hayly [<mailto:humphreys.hayly@epa.gov>]
Sent: Wednesday, January 23, 2019 3:04 PM
To: Tom Roberts
Cc: Wehrum, Bill; Eby, Natasha
Subject: RE: Request to Meet with Acting Administrator Wheeler

Hi Tom,

Apologies for the delay. Is your group available to meet on Monday, January 28th?

Best,
Hayly

Hayly Humphreys
Office of the Administrator
U.S. EPA

From: Tom Roberts <tcr@vnf.com>
Sent: Thursday, January 17, 2019 5:08 PM
To: Humphreys, Hayly <humphreys.hayly@epa.gov>
Subject: Request to Meet with Acting Administrator Wheeler

Hayly – my firm represents Sotera Health and its subsidiary, Sterigenics. As you may be aware, Sterigenics has received a fair amount of attention from EPA over the last several months.

I currently am in the process of arranging a meeting between the Illinois Congressional Delegation and Sotera Health's CEO, Michael Petras for Tuesday, January 29.

If possible, I also would like to arrange a meeting between Acting Administrator Wheeler and Mr. Petras for January 29.

Bill Wehrum suggested I contact you directly with this request in order to put something on the calendar.

I look forward to your response. Thank you for your time and consideration.

Tom Roberts | Partner
VanNess Feldman LLP

1050 Thomas Jefferson Street, NW
Washington, DC 20007

(202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com

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From: POLITICO Pro Energy Whiteboard [politicoemail@politicopro.com]
Sent: 1/16/2019 5:06:51 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Duckworth alleges political interference with ethylene oxide inspections

By Alex Guillén

01/16/2019 12:05 PM EDT

Sen. Tammy Duckworth (D-Ill.) today alleged that political appointees at EPA's Region 5 office in Chicago have instructed agency employees not to inspect facilities that use a certain carcinogenic chemical.

Ethylene oxide is used to sterilize medical equipment and is used to make products like antifreeze, plastics and detergents, according to EPA.

Duckworth said at a confirmation hearing for acting Administrator Andrew Wheeler that Region 5 Administrator Cathy Stepp and other political appointees had given the order. She also said it appears EPA had not conducted any inspections on ethylene oxide in at least the last six months.

It is "incredibly disappointing," said Duckworth, who noted specifically concerns from residents near an ethylene oxide hearing in Willowbrook, Ill., but that facilities across the U.S. use it. She called for EPA's Office of Inspector General to investigate.

"I'd like to talk to my staff and find out what's going on there. This is news to me," responded Wheeler.

The American Chemistry Council last year complained that EPA has used a "significantly flawed risk value" and asked EPA to revisit its findings.

To view online:

<https://subscriber.politicopro.com/energy/whiteboard/2019/01/duckworth-alleges-political-interference-with-ethylene-oxide-inspections-2507569>

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This email was sent to wehrum.bill@epa.gov by: POLITICO, LLC 1000 Wilson Blvd. Arlington, VA, 22209, USA

From: drew sikula **Personal Address / Ex. 6**
Sent: 5/30/2019 6:32:06 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; EtO [EtO@epa.gov]
CC: john.j.kim@illinois.gov
Subject: Unanswered EtO questions for you to consider

Importance: High

Dear Mr. Wehrum and others responsible for our safety at the US EPA:

I attended the open house and community forum in Burr Ridge yesterday and have many unanswered questions that should be addressed.

The US EPA has been responsible for ensuring clean air for decades and has proven to be ineffective in the case of EtO emissions. The excuse provided is that scientific conclusions changed in 2016 and it takes time to establish new regulations. As communicated last night, the regulations you will be proposing are based on your new risk assessment and would allow Sterigenics to continue to operate in a densely populated community such as Willowbrook indefinitely provided they comply with some enhanced controls that are yet to be determined.

This conclusion is based on your new risk assessment, the details of which have not yet been published. You have communicated this risk assessment is based on the most current scientific conclusions available. However, this is no different than prior positions the US EPA has taken regarding EtO emissions whereby the environment was falsely considered to be safe based on current science at the time.

Have you factored in the risk that current scientific conclusions understate the actual risk to the community? I'm sure the EPA teams that conducted the prior risk assessments also thought they were conservative in their estimates, but we now know these were fatally flawed assumptions.

What is the risk of proposing and/or implementing a regulation that only allows EtO to be emitted in rural areas? Of course the regulation would add short term cost to the industry; however, it would provide significant protections against the likely possibility that your new risk assessment (based on current science) understates the true risk of exposure to the known carcinogen. Not to mention the impact on the communities affected and their trust in the government's competence.

I know you must consider the cost/benefit. **What is the value of your (grand)children's lives? Does it justify the cost of moving existing EtO sterilization facilities to remote locations in order to minimize their risk?** I hope so.

Please respond with answers to my questions and consider this feedback as you propose and determine your new regulations.

Sincerely,

Drew Sikula

Personal Matters / Ex. 6

Message

From: Woods, Clint [woods.clint@epa.gov]
Sent: 12/10/2018 10:12:02 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: New EPA tests near Sterigenics show ethylene oxide cancer risks haven't disappeared - Chicago Tribune

<https://www.chicagotribune.com/news/local/breaking/ct-met-sterigenics-epa-new-air-testing-cancer-20181207-story.html>

Message

From: walter miss [Personal Address / Ex. 6]
Sent: 12/10/2018 9:53:13 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Sterigenics

Dear Mr. Wehrum,

I live a half mile from the Sterigenics facility in Willowbrook IL. I was diagnosed with breast cancer three years ago at age 52. I implore you to declare a Public Health Crisis and to utilize your Emergency Powers, granted by the Clean Air Act to shutdown Sterigenics immediately. Testing has confirmed fugitive Ethylene Oxide emissions with no evidence of Trans 2 Butene. The risk of cancer is real!

I would appreciate a personal response.

Kathleen Mis

[Personal Address / Ex. 6]

•

Message

From: Amanda Puchalski [Personal Address / Ex. 6]
Sent: 12/10/2018 5:02:31 AM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Sterigenics

You must declare a Public Health Crisis and utilize your Emergency Powers in Section 34B of the Clean Air Act to shutdown Sterigenics immediately. Testing has confirmed fugitive Ethylene Oxide emissions with no evidence of Trans 2 Butene. I am a real person with a real family in danger and I'm not a "Lab Rat."

Respectfully,
Mandy Puchalski

Message

From: Andrea Thome, Author [**Personal Address / Ex. 6**]
Sent: 12/19/2018 5:15:27 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Sterigenics

Mr Wehrum,

Attached, please find a letter pertaining to recent information that has come to light about Sterigenics in Willowbrook, IL. I think you'll agree that the immediate and permanent shutdown of this company is long overdue. Will you be the person to do the right thing, since you have the power to shut them down?

Our group of concerned and scared citizens is not going away. We are growing, and in January, we are taking our concerns to the national stage. It would certainly be better for everyone involved if we could have a resolution before it gets that far. This is another stain on the reputation of our state and U.S. government.

Please address this Immediate Public Health Crisis in short order. It's the right thing to do, as I am also sure you are aware.

Sincerely,

Andrea and Jim Thome

Personal Address / Ex. 6



September 18, 2018

William Wehrum - Assistant Administrator of the Air and Radiation Department, USEPA
 Alec Messing - Director, Illinois EPA
 Robert Berlin - DuPage County State's Attorney
 Lisa Madigan - Illinois Attorney General

Dear Mr. Wehrum, Mr. Messing, Mr. Berlin and Ms. Madigan,
 In 1984 Griffith Laboratories, the original name of the Sterigenics plant, applied for a permit to the Illinois EPA. In a response to their application, the EPA expressed serious concerns about Ethylene Oxide emissions:

- 1) The EPA predicted ambient air levels of Ethylene Oxide as high as 3,320 micrograms/cubic meter and as low as .09983 micrograms/cubic meter as far as one mile away from the plant.
- 2) The EPA referenced a draft of a "USEPA Health Assessment Document" which provided evidence of human cancers of the pancreas, bladder, central nervous system and stomach associated with EO exposure. The studies showed carcinogenic, mutagenic, leukemogenic and teratogenic effects.
- 3) The USEPA studies indicate that the highest acceptable ground level concentration of EO is .007 micrograms/cubic meter.
- 4) While the EPA indicated that their current rules had not yet been updated to reflect what they now knew about ethylene oxide, they were uncomfortable with issuing the permit. Regardless, we know that the permit was subsequently granted to build the sterilization facility in Willowbrook.

In 2018, ambient air testing by the USEPA and independent air testing by the Village of Willowbrook indicated levels much higher than those originally modeled:

- 1) USEPA testing revealed EO levels as high as 6.21 micrograms/cubic meter across the street from Sterigenics and .186 micrograms/cubic meter at Willow Road Park, .95 miles away.
- 2) Village of Willowbrook indoor air testing showed EO levels of .29 micrograms/cubic meter in Lower West Elementary School, .61 micrograms/cubic meter in Middle South High School and .49 micrograms/cubic meter at Lower Middle School.
- 3) Our children are breathing in as much as 64 times the USEPA's recommended ground level concentration.

The USEPA and EPA claim that they cannot shut down Sterigenics because they need to conduct more studies. The USEPA and EPA have been conducting studies since 1984 and has known for nearly 35 years that the Sterigenics plant was unsafe and would emit levels exceeding their safety threshold. We know from current testing that current air levels exceed safety standards by 64 times in our schools and 667 times in our Village Hall. How many more years of testing does the USEPA need to be convinced of the danger that our community is living in? How many more people need to become ill? Perhaps the Office of the Inspector General will be able to tell us why the USEPA has been unwilling to act.

Bill Wehrum, USEPA has the authority to order an immediate shutdown through powers granted by the Clean Air Act.

Alec Messing, EPA has the authority to seal the facility under section 108 of the Global Environmental Protection Act.

Robert Berlin, DuPage County State's Attorney and Lisa Madigan, Illinois Attorney General have the authority to file an injunction in the courts to shutdown Sterigenics via section 43 of the Illinois Environmental Protection Act.

Who will do their job and protect this community?

The Stop Sterigenics Community

Message

From: Jennifer McConahy **Personal Address / Ex. 6**
Sent: 12/19/2018 4:14:54 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Sterigenics
Attachments: 12-19 Press Release.pdf; 12-19-18 Reaction to 1984 Document.pdf; second_data_set_foot USEPA.pdf; 1984-07-06-letter-from-IEPA-1.pdf

Mr. Wehrum,

How much longer must we endure exposure to EtO? Clearly the government knew there was a problem 34 years ago, see attachment. You are doing NOTHING to protect our children. The clock started ticking for them when they were in utero and continues now as the levels are high in their schools. The webinar yesterday was not helpful in any way and was just another display of the EPA dodging questions and giving us the same information over and over again. We would appreciate answers to all the questions we submitted back in November and also yesterday. We would appreciate a response from you in regards to this press release and information.

Jennifer McConahy

Message

From: Janel Featherstone Personal Address / Ex. 6
Sent: 12/19/2018 3:21:44 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Sterigenics

Good Morning,

I am a Willowbrook resident who lives within a mile of Sterigenics. My two children attend the local schools and spend pretty much 24 hours a day within a mile of the facility. After the study was released in August, I felt assured that the EPA would react quickly and the facility would rapidly be shut down due to clear public health risk or at least shut down until safety of the local community could be verified.

You can imagine my distress when even after multiple air studies have clearly demonstrated elevated levels of ETO in the air in the schools and surrounding residential areas the EPA continues to want to study more. Would you want your children to be breathing a Class I carcinogen 24/7 days a week? Guess what? I don't want to live this way either.

DO YOUR JOB!!!! SHUT IT DOWN!!!! Or maybe let's have all the EPA employees relocate their families to our neighborhood and schools while you decide just how much of a safety risk Sterigenics represents.

Tired of waiting for you to do your job

Janel Featherstone

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 12/3/2018 2:57:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: FW: Willowbrook samples Nov 14-20 - All spreadsheets
Attachments: sample log R5.xlsx; willowbrook sum nov_18.xlsx; willowbrook nov14_20 eto.pdf; willowbrook nov14_20 eto.xls

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Koerber, Mike
Sent: Monday, December 3, 2018 9:45 AM
To: Woods, Clint <woods.clint@epa.gov>
Subject: FW: Willowbrook samples Nov 14-20 - All spreadsheets

Clint: This just in! Prior to posting, we will try to set up a quick heads up call with the local elected officials in the next day or so. Also, we are working on appropriate web language that I will share with you when it's ready.

Mike

From: Chen, Xi
Sent: Monday, December 03, 2018 9:00 AM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Shappley, Ned <Shappley.Ned@epa.gov>
Cc: Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Subject: FW: Willowbrook samples Nov 14-20 - All spreadsheets

Hi all,
Please see attached spreadsheet "willowbrook sum nov_18" for the EtO measurement data we got for the first three days of sampling. Note that 19th Nov was the first day of full deployment at all of our 8 sites. Trans-2-butene or cigarette marker 2, 5-dimethylfuran were not detected in any of these samples. Let me know if you have any questions.

Thanks,
Doris

From: Julie Swift <Julie.Swift@erg.com>
Sent: Thursday, November 29, 2018 4:18 PM
To: Chen, Xi <Chen.Xi@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Subject: Willowbrook samples Nov 14-20 - All spreadsheets

I have attached finalized reports. I will include all of these files when I provide new reports to you. Please let me know if you would like me to change the summary spreadsheet or the log.

Thank you! Julie

Julie L. Swift

ERG

Office - (919) 468-7924 | Fax - (919) 468-7803

julie.swift@erg.com

From: Julie Swift

Sent: Thursday, November 29, 2018 12:51 PM

To: Chen, Xi <Chen.Xi@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>

Subject: Willowbrook samples Nov 14-20

I have attached the Excel and PDF reports for the first set of samples analyzed at the Willowbrook sites. The data is reported two files, a PDF and XLS report.

All samples received in the lab to date, are reported in the "sample log R5.xlsx" attached file. I will add to this when I send out each report. The first set of duplicates was invalidated and the explanation is outlined in this file.

I am working on the extra summary spreadsheet and will send that to you as soon as it has been QA'd. I should be able to get that sent to you within the next few hours, but thought you would like to see the results now

Please let me know if you have any questions. Thank you! Julie

Julie L. Swift

VP/Program Manager/Chemist

ERG

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560

Office - (919) 468-7924 | Fax - (919) 468-7803

julie.swift@erg.com

Message

From: Melissa Schneider [mailto:Personal Address / Ex. 6]
Sent: 12/18/2018 4:24:40 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group
(FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Sterigenics

Dear Mr. Wehrum,

It is my understanding that you have the authority to help shut down the Sterigenics company in Willowbrook, IL. I live in DuPage County near this facility and I can tell you that it is completely unacceptable to the thousands of residents in our county, that they EPA has done nothing to shut this place down, despite all the EtO testing that has been done showing evidence that we are still being poisoned literally to death by this company. What is the hold up? When is the EPA going to do something about this? When are YOU going to do something about this?

-Melissa Schneider

Personal Address/Personal Phone Ex. 6

Message

From: DeLuca, Isabel [DeLuca.Isabel@epa.gov]
Sent: 12/17/2018 11:02:09 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.clint@epa.gov]; Lewis, Josh [Lewis.Josh@epa.gov]; Millett, John [Millett.John@epa.gov]
Subject: Draft intro talkers for Bill -- EtO webinar tomorrow
Attachments: Wehrum Opening Remarks EtO Webinar 12-18-18.OAQPS.docx; ATT00001.htm

Hi Bill,

Here are some draft talkers for the webinar tomorrow.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Thanks,
Isabel

Message

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 11/9/2018 9:59:22 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]
Subject: Tuesday's calendar
Attachments: Wehrum Bill Calendar.ics

Hi Bill –

Please find your Tuesday calendar below. Note that today's call with Jeff Lautt was moved to 9am on Tuesday. Also, motorpool to the White House leaves at 10am, yet your meeting with Phil runs till 10:15, so you may want to take a cab over. Motorpool will bring you back at noon, and your 12:30 is across the street from EPA.

▲ Tue, Nov 13

<input type="checkbox"/>	All Day	Deliberative Process / Ex. 5
<input type="checkbox"/>	All Day	
<input type="checkbox"/>	Before 8:00 AM	
<input type="checkbox"/>	8:00 AM – 9:00 AM	
<input type="checkbox"/>	9:00 AM – 9:30 AM	
<input checked="" type="checkbox"/>	9:30 AM – 10:15 AM	Meeting with Phil MacNabb re: Sterigenics (CONFIRMED)
<input checked="" type="checkbox"/>	10:00 AM – 10:30 AM	Deliberative Process / Ex. 5
<input checked="" type="checkbox"/>	10:30 AM – 11:00 AM	
<input checked="" type="checkbox"/>	11:00 AM – 11:30 AM	
<input checked="" type="checkbox"/>	11:00 AM – 12:00 PM	
<input checked="" type="checkbox"/>	12:00 PM – 12:30 PM	
<input checked="" type="checkbox"/>	12:30 PM – 1:45 PM	
<input type="checkbox"/>	1:00 PM – 2:00 PM	
<input checked="" type="checkbox"/>	1:45 PM – 2:15 PM	
<input checked="" type="checkbox"/>	2:00 PM – 3:00 PM	
<input checked="" type="checkbox"/>	3:00 PM – 4:30 PM	
<input type="checkbox"/>	3:00 PM – 4:30 PM	
<input checked="" type="checkbox"/>	4:30 PM – 5:00 PM	
<input checked="" type="checkbox"/>	4:30 PM – 5:00 PM	
<input checked="" type="checkbox"/>	5:00 PM – 5:45 PM	
<input type="checkbox"/>	After 5:45 PM	Free

Have a great weekend!

Delaney Rakosnik
Staff Assistant

Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

Congress of the United States

Washington, DC 20510

November 9, 2018

Bill Wehrum
Assistant Administrator, Air and Radiation Division
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Wehrum:


We write to request the Air and Radiation Division (ARD) of the U.S. Environmental Protection Agency (EPA) conduct modeling and air sampling analysis of ethylene oxide (EtO) emissions at two sites in Lake County, Illinois—Medline Industries, Inc. in Waukegan and Vantage Specialty Chemicals, Inc. in Gurnee. We also request that ARD coordinate with the Agency for Toxic Substances and Disease Registry (ATSDR) to perform an evaluation with the modeled and measured EtO results to determine what the public health risk is for the area. This request stems from changes in the 2016 Integrated Risk Information System (IRIS) report and the 2014 National Air Toxics Assessment (NATA) that found EtO to have a 30-fold increase in cancer potency.

In May, the EPA conducted air sampling and modeling around Sterigenics International Inc.—a facility in Willowbrook, Illinois, that uses EtO to sterilize medical equipment. After ATSDR evaluated these results, it was recommended that Sterigenics take immediate action to reduce its EtO emissions. Since then, it has been discovered that two other facilities in Lake County, Illinois, are also responsible for emitting concerning EtO concentrations based upon the new, lower inhalation unit risk from IRIS.


We ask that air sampling and modeling analyses are performed and provided to ATSDR to evaluate the risk of short-term and long-term exposure of EtO in the air surrounding these facilities. This information is crucial for better understanding the implications of EtO exposure within the community and for setting a new and more appropriate EtO national standard.

Thank you for considering our requests, and we look forward to your response.

Sincerely,


RICHARD J. DURBIN
United States Senator


TAMMY DUCKWORTH
United States Senator


BRADLEY S. SCHNEIDER
United States Representative

Message

From: DeLuca, Isabel [DeLuca.Isabel@epa.gov]
Sent: 11/27/2018 4:10:47 PM
To: Woods, Clint [woods.clint@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Millett, John [Millett.John@epa.gov]
Subject: FW: Sterigenics Comments On EPA's Statement Regarding Inaccurate Willowbrook Air Test Results
Attachments: Sterigenics+Statement+on+EPA+Flawed+Test+Results+11.26.18.pdf

Hi all,

I'm guessing you may have gotten this statement from Sterigenics directly from John Konkus, but if not, see attached.

Thanks,
Isabel

Appointment

From: Microsoft Outlook [MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@usepa.onmicrosoft.com]
Sent: 12/13/2018 5:02:50 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Meeting Forward Notification: Conference call with Willowbrook citizen Jennifer McConaghy re: Sterigenics facility
Location: WJC - N 5400 + conference call
Start: 12/13/2018 5:30:00 PM
End: 12/13/2018 6:00:00 PM
Recurrence: (none)

Your meeting was forwarded

Harlow, David has forwarded your meeting request to additional recipients.

Meeting

Conference call with Willowbrook citizen Jennifer McConaghy re: Sterigenics facility

Meeting Time

Thursday, 13 December 2018 12:30-13:00.

Recipients

Harlow, David

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 11/21/2018 9:13:10 AM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: draft web language about EtO interference issue

FYI

Begin forwarded message:

From: "Woods, Clint" <woods.clint@epa.gov>
Date: November 20, 2018 at 6:10:46 PM EST
To: "Davis, Alison" <Davis.Alison@epa.gov>
Cc: "Koerber, Mike" <Koerber.Mike@epa.gov>, "Rimer, Kelly" <Rimer.Kelly@epa.gov>
Subject: RE: draft web language about EtO interference issue

A few edits below

From: Davis, Alison
Sent: Tuesday, November 20, 2018 4:53 PM
To: Woods, Clint <woods.clint@epa.gov>
Cc: Koerber, Mike <Koerber.Mike@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: draft web language about EtO interference issue

Clint,
Here is some draft language for your review. We could post this soon – after we make a few heads up calls. We would like to raise this on the meeting planning call tomorrow – it will be a good opportunity to flag it for public officials. Please let me know your thoughts on that. Thanks .

DRAFT

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Message

From: Macnabb, Philip [PMacnabb@sterigenics.com]
Sent: 11/7/2018 7:09:33 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
CC: tcr@vnf.com; Taylor, Byron F. [bftaylor@sidley.com]
Subject: Sterigenics Meeting

Bill

I apologize for the late notice, but I will need to cancel our meeting scheduled for tomorrow November 8th in your office. I have a board meeting in Florida tomorrow and logistics will not allow me to get there in time. I do feel it is important for us to get together face to face and am hoping you are open to turning our Monday call on the 12th into a face to face meeting. Again, I would come to your office, likely accompanied by Byron Taylor from Sidley Austin as Tom Roberts will be out of town that day. I will call your assistant to coordinate.

As a follow up to our conversation this week, when Ed Nam from your Region 5 office shared with us that they had performed air monitoring in the Willowbrook area, we considered the question of whether there is a background ambient concentration of ethylene oxide that might affect the interpretation of the data collected. Our consultant identified an EPA database that had ambient monitoring results for ethylene oxide from locations in New Hampshire and Rhode Island. I have included a link to that database below, so you can evaluate it, too. Our consultant found detectable concentrations of ethylene oxide in nearly 3,600 of the approximately 13,000 data points. The average ambient concentration in the data set was about 0.29 ug/m3. We shared this information with Mr. Nam via email on August 19th, before the ATSDR report was issued.

The database can be found at this link: <https://www3.epa.gov/ttnamti1/toxdat.html#data>.

Thanks again, and feel free to contact me directly with any questions

Philip Macnabb

President

Sterigenics, A Sotera Health company

2015 Spring Rd, Suite 650

Oak Brook, IL 60523

pmacnabb@sterigenics.com

www.sterigenics.com

O: (630) 928-1733



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Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 5/26/2019 7:11:16 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: FW: Risk Assessment Results for Sterigenics - Willowbrook V4 for Mikes review.pptx

Sorry – forgot to add that we are still planning to do some clean up:

Deliberative Process / Ex. 5

Message

From: Annette Ciolek **Personal Address / Ex. 6**
Sent: 12/20/2018 12:05:34 AM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Shut Sterigenics DOWN!

I am a very concerned resident of Willowbrook, IL. The results are in for the air testing for ethylene oxide in Willowbrook and Burr Ridge. Ethylene oxide is in our air, our schools and our homes in high levels. From what I've been told, the EPA plans on doing additional testing over the next 3 months. This is completely unacceptable to our community. We are NOT lab rats. People are sick and dying. People who are not sick or dying are at much greater risk of being sick in the future than the general population. It is unconscionable that we should have to endure even one more day of ethylene oxide exposure. We have already unknowingly been poisoned for the last 34 years. Mr. Wehrum, at the EPA Webinar the other day, you urged us to "establish trust" with Sterigenics. Seriously? This company has completely breached the trust of this community. They have shown again and again that they have a complete disregard for our safety. And now a letter comes to light from 1984 which proves that not only the Illinois EPA but Sterigenics knew of the risk to our community when they began spewing it into our air in 1984. We will settle for nothing less than the complete cessation of ethylene oxide use in our community. Ethylene oxide is carcinogenic at ANY level. There are alternate methods of sterilizing medical equipment, as the prestigious Northwestern Hospital recently implemented.

We, the residents of Willowbrook and the surrounding communities demand that a public health crisis be declared. The EPA and the Illinois EPA should have all the information they need at this point. Let me ask you, how quickly would you act if your own family lived in Willowbrook? We need your help and we need it NOW.

Thank you for your prompt attention to his urgent matter.

Annette Ciolek

Personal Address / Ex. 6

Message

From: Julia Krumplis [Personal Address / Ex. 6]
Sent: 12/19/2018 8:37:50 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Since 1984

Dear Mr. Wehrum,

We now know that there is currently EtO in the air in our parks, schools and neighborhoods. We also now know that the dangers of EtO have been known since at least 1984. I have included a link the the Stop Sterigenics press release and open letter below.

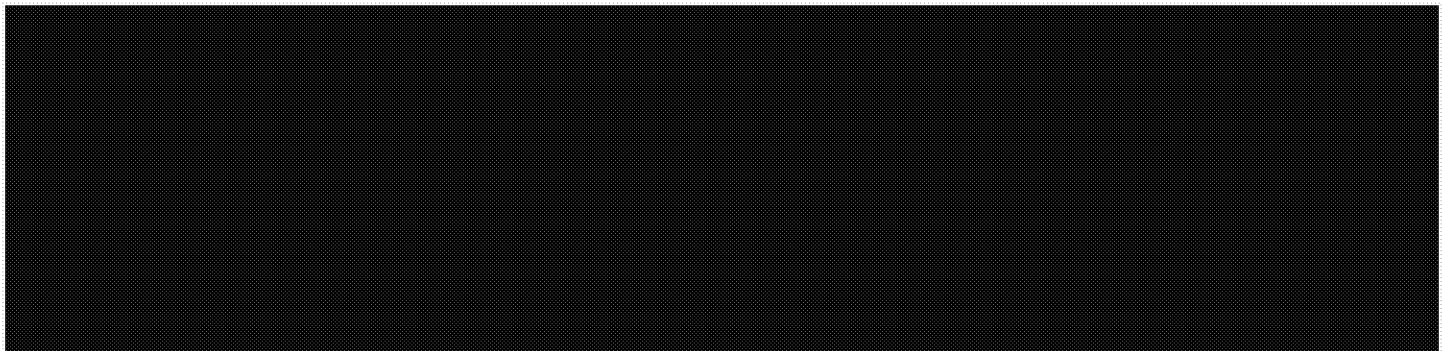
Why has the Sterigenics plant not yet been shot down? We know enough today right now to do the only moral thing, which is to shut the plant down immediately today. I dread to think of how much damage has been done since 1984 and I shudder to think of all those who will still get sick because of what has been as already happened. That we now both the incredible toxicity of this chemical and that it is being released into the air everyday, it is found in our air and yet nothing has been changed since August to make the people living around the plant one bit safer-- this is immorality which rattles my soul. That this in know and nothing has changed to protect the people in 4 month is utterly inexcusable and and unacceptable. We do not need more test, analysis, or discussions of any sort, we need action! We know enough to justify action in rational caring person's mind.

I'm calling on you to demonstrate leadership, morality, and courage, and shutter this plant once and for all. We are counting on you, the families of Willowbrook, Darien, Burr Ridge. You are the top air guy at the EPA. This our air. It is hurting people everyday! Please do your job and protect us from another molecule of this nightmare substance. This is an emergency.

When can we except action which will actually project and make us safer?

Sincerely,
Julia

[Stop Sterigenics | Blog](#)



Stop Sterigenics | Blog

It is our mission to secure the safety of our communities by eliminating the emission of ethylene oxide, a group...

Message

From: Woods, Clint [woods.clint@epa.gov]
Sent: 5/6/2019 7:57:33 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Fwd: FOR CLEARANCE -- Draft meeting invite 5.3.19.docx
Attachments: Draft meeting invite 5.3.19.docx; ATT00001.htm

Begin forwarded message:

From: "Davis, Alison" <Davis.Alison@epa.gov>
Date: May 6, 2019 at 3:53:13 PM EDT
To: "Woods, Clint" <woods.clint@epa.gov>
Cc: "DeLuca, Isabel" <DeLuca.Isabel@epa.gov>
Subject: FOR CLEARANCE -- Draft meeting invite 5.3.19.docx

We'd like to get this posted tomorrow if possible.

Thanks.

Message

From: Woods, Clint [woods.clint@epa.gov]
Sent: 5/6/2019 12:34:03 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Fwd: Sterigenics Risk Assessment
Attachments: EO Sources in Willowbrook.pdf; ATT00001.htm; EPA testing Days with Other activities.pdf; ATT00002.htm

FYI for call today (one other related item I need to mention as well)

Begin forwarded message:

From: "Koerber, Mike" <Koerber.Mike@epa.gov>
Date: May 6, 2019 at 7:07:26 AM EDT
To: "Woods, Clint" <woods.clint@epa.gov>
Subject: FW: Sterigenics Risk Assessment

FYI

From: Hoffman, Kathy <KHoffman@sterigenics.com>
Sent: Friday, May 03, 2019 5:33 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>
Subject: Sterigenics Risk Assessment

Mike:

Thank you for talking with me earlier this week about the risk assessment underway on the Sterigenics Willowbrook location. As we discussed, we would like to provide some further information on some other EO sources around our Willowbrook facility as well as some construction that has occurred at the Willowbrook Town Hall during your sampling period.

I hope this information helps explain our concerns.

Regards,
Kathy

Kathleen Hoffman
Senior Vice President - Global Environmental, Health & Safety and Technical Services
Sterigenics, A Sotera Health Company
2015 Spring Road, Suite 650
Oak Brook, IL 60523
Office: 630.928.1758
khoffman@sterigenics.com



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distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

From: Woods, Clint [woods.clint@epa.gov]
Sent: 5/23/2019 12:49:08 AM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
Subject: Fwd: Update in IL

Begin forwarded message:

From: "Crist, Greg" <GCrist@AdvaMed.org>
Date: May 22, 2019 at 6:31:17 PM EDT
To: "woods.clint@epa.gov" <woods.clint@epa.gov>
Subject: Update in IL

Clint,

I am sure you are tracking this. But below is an internal summary for me. Happy to answer any questions.

- Uncertainty returned; bills could all die; AG settlement still possible.
- IEPA Policy – no progress.
- Durkin “seal order” amendment is disliked by everyone.
- Bush pushing explicit manufacturer regulation.
- Aiming to set call for Thursday afternoon.

Uncertainty

Lots of hour-by-hour changes, behind the scenes politicking and speculation about next steps in the EO regulation debate in Illinois. I was close to pushing a note out last week but things became too fluid and it seemed better to wait and see how it played out. There are three major buckets of work underway: 1) the overall policy being pursued by IEPA in IL HB 457, 2) Leader Durkin’s “seal order” amendment” and 3) Senator Bush’s desire to expand all of the policy to cover manufacturer-sterilizers and contract-sterilizers alike. These ideas are competing, the situation has become less organized and more fluid and there is a greater chance of conflict between the parties, threatening some or all of the bills from passing in this session. Finally, it is important to remember that if all of the bills die, a settlement and consent decree between IEPA and Sterigenics is still possible and if they move quickly and aggressively, they could in theory implement the upgrades necessary to reopen.

IEPA Policy & Cleanup Still Unavailable

The IEPA cleanup bill that was rumored to be close to release about two weeks ago is still unavailable. Because of this, several other members have begun to reassert their own authority in the issue, creating uncertainty about who is in charge. On our last call, we did a deep dive on the policies in IL HB 457. We concluded that there are low hanging fruit issues to address and other issues that are probably not a good value proposition for AdvaMed to engage on. We are developing a list of priorities and I hope to share a draft of that soon.

Senator Durkin Seal Order Language

IL SB 1852 House Amendment #1 is now available. The bill is a copy of IL HB 457 with the added amendment states that a company that has been subject to a seal order may not use EO for sterilization used unless: 1) the facility can provide a certification to the IEPA “by the supplier of a product to be sterilized” that EO is the only available method to complete sterilize the product and 2) the IEPA has certified that the facility’s emission control system used technology that produces the greatest reduction in EO emissions currently available (BAT standard). Please note that I read “supplier” to possibly mean “distributor” or it could mean manufacturer or distributor. We have alerted the distribution industry. The provision also requires that “kit” products require a further certification that EO is the only method available to completely sterilize more than half of the products contained in a kit product.

Senator Bush Manufacturer Language

The attached bill draft (“New EtO Non-Sterilization Emissions Bill...”) shall expressly expand new EO regulation over manufacturers to require new permit approval by IEPA, ambient air monitoring and dispersion modeling to be conducted by each manufacturer. We do not know if she intends to introduce this this year or next year. Originally, she had told us she may be interested in saving this for next year.

We are aiming to set a call on this in the next day or two.

Please let me know if you have any questions.

greg

From: Tom Roberts [tcr@vnf.com]
Sent: 4/17/2019 3:32:18 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Woods, Clint [woods.clint@epa.gov]
Subject: Implications of Shutdown of Sterigenics' Willowbrook Facility

Bill / Cliff – I wanted to ensure that you had seen this statement from FDA and related media articles regarding the impact on the supply of certain medical devices resulting from the shutdown of the Sterigenics Willowbrook facility.

I also have attached for your information a recent letter from the IL Congressional Delegation urging the FDA to find alternatives to then use of ethylene oxide for sterilization purposes.

Thanks.

Statement from Jeff Shuren, M.D., director of the Center for Devices and Radiological Health, on agency efforts to mitigate temporary shortage of pediatric breathing tubes due to recent closure of Illinois sterilization facility

FDA Newsroom
12 April 2019

As part of the agency's ongoing efforts to minimize impacts of medical product shortages, last month, the FDA alerted the public of the potential for medical device shortages to arise from the closure of a large ethylene oxide sterilization facility in Willowbrook, Illinois, and the future planned closure of a similar facility in Michigan. Since the closure was announced, we have been taking steps to prevent patient harm from potential device shortages that could delay or disrupt critical care, including working to quickly and proactively secure alternative locations and methods for the sterilization of devices that were previously processed at the Willowbrook facility. We also committed to sharing updates on potential impacts to medical devices once sterilized at these facilities.

Despite best efforts to minimize the impact of the closures wherever possible, we have identified a medical device that is now in temporary shortage. Today, we are alerting health care professionals, parents and caregivers that there is a temporary shortage of a type of a tracheostomy tube manufactured by Smiths Medical. I want to assure you that the FDA is working closely with the company to quickly resolve their sterilization challenges and bring these critical devices to the patients who need them as quickly as possible, which we anticipate will be made available again beginning the week of April 22.

Smiths Medical's Bivona tracheostomy tubes are used in health care facilities, such as hospitals, or at home to help adult and pediatric patients breathe. A tracheostomy is a surgical procedure that creates a small opening that goes through the skin and tissue of the neck directly into the windpipe (trachea). The tracheostomy tube is placed through this opening, called a stoma, into the trachea to allow a patient to breathe through the tube instead of through their mouth or nose. Prior to initial use, Bivona tracheostomy tubes are sterilized with ethylene oxide before they are marketed in the U.S. After initial use, patients may reuse the tubes by reprocessing them as described in Bivona's Instructions for Use. disclaimer icon Hospitals also may clean the tubes and sterilize them so they can be reused on the same patient.

Although the Bivona tubes are indicated for use in both adult and pediatric patients, the temporary shortage is more likely to impact pediatric patients because supply of alternative tubes with similar functionality is limited. The Bivona tube is made from a flexible silicone material which makes them easier to insert in the stoma of pediatric patients. While there are other FDA-cleared silicone tracheostomy tubes for pediatric patients, there may not be enough available to adequately cover the shortage. We recognize the challenges this shortage imposes for these pediatric patients who need access to new tubes now, and are working to limit the impact to patients as much as possible by helping the company quickly move their sterilization to another facility.

During the temporary shortage, health care professionals who have patients urgently in need of a new Bivona tube should contact Smiths Medical directly to inquire about current inventory. Parents and caregivers who need new Bivona tubes (e.g., due to damage or leaking of current tubes) should work with their health care professionals to find an appropriate alternative until the Bivona tracheostomy tube is back on the market. Adult patients experiencing problems obtaining Bivona tubes should talk with their health care professional about using other FDA-cleared tracheostomy tubes, including those made from different materials.

The closure of the Willowbrook facility does not impact tubes already in use by patients at home or in health care settings. The company is communicating with patients about the tubes and how patients and caregivers can mitigate any potential impact, including re-using and cleaning tubes in accordance with the manufacturer's instructions for use.

The company is continuing to manufacture tracheostomy tubes per their normal schedule. The company has already started to use an alternative facility to sterilize their devices and estimates that approximately 28,000 new Bivona tracheostomy tubes are currently awaiting sterilization. We are working closely with Smiths Medical to expedite release of sterilized tubes that still meet the FDA's standards for safety and effectiveness and expect new tubes to be available within the next few weeks.

At this time, we are not aware of any other shortages due to these closures. As with the case of Smiths Medical, early awareness and engagement enables us to be proactive and develop a plan to mitigate effects on patient care. We continue to monitor the situation closely, including any submissions to the FDA device shortages mailbox and stand ready to act quickly with strategies intended to limit the impact of device supply interruptions on patients. We are continuing to update our ethylene oxide in medical device sterilization web page to ensure patients, health care professionals and industry have the most up-to-date information. As we previously noted, we're seeking to not only limit the immediate impact of these facility closures, but also to identify new and improved methods for medical device sterilization for which we will make additional announcements in the coming weeks.

We recognize the very real consequences that medical device shortages have on patients, and we'll continue to work directly with manufacturers, contract sterilizers, government agencies and other public health stakeholders to do all we can to avert new device shortages.

EO plant shutdown leads to pediatric breathing tube shortage

Medical Design & Outsourcing

By Nancy Crotti

12 April 2019

The February shutdown of an ethylene oxide (EO) sterilization plant has produced the first temporary medical device shortage, according to the FDA.

The device in short supply is the Bivona tracheostomy tube manufactured by Smiths Medical and used by many pediatric patients. The FDA anticipates the tube will be made available again the week of April 22, according to a statement from Dr. Jeffrey Shuren, director of the agency's Center for Devices and Radiological Health (CDRH). The state of Illinois ordered the shutdown of the Sterigenics plant in Willowbrook, Ill. due to emissions of EO, a highly carcinogenic chemical compound.

"I want to assure you that the FDA is working closely with (Smiths Medical) to quickly resolve their sterilization challenges and bring these critical devices to the patients who need them as quickly as possible," Schuren said in the statement.

Although the Bivona tubes are indicated for use in both adult and pediatric patients, the temporary shortage is more likely to affect children because the supply of other manufacturers' tubes that work for children is limited. The Bivona tube is made from a flexible silicone material that makes them easier to insert into an opening in the trachea of a pediatric patient, the FDA said.

Bivona tracheostomy tubes are sterilized with EO before they are marketed in the U.S. After initial use, patients at home may reuse the tubes by reprocessing them as described in Bivona's instructions for use. Hospitals also may clean the tubes and sterilize them so they may be reused on the same patient.

Smiths (Plymouth, Minn.) is continuing to manufacture tracheostomy tubes on its normal schedule, and has approximately 28,000 new Bivona tracheostomy tubes awaiting sterilization, according to the statement. The company has already started to use a different facility to sterilize its devices, the FDA said. A Smith Medical spokesperson was not immediately available for comment.

"We are working closely with Smiths Medical to expedite release of sterilized tubes that still meet the FDA's standards for safety and effectiveness and expect new tubes to be available within the next few weeks," Shuren said. "We recognize the challenges this shortage imposes for these pediatric patients who need access to new tubes now, and are working to limit the impact to patients as much as possible by helping the company quickly move their sterilization to another facility."

Shuren advised healthcare professionals whose patients urgently need a new Bivona tube to contact Smiths Medical directly. Parents and caregivers who need new Bivona tubes should work with the child's doctor or nurse to find an appropriate temporary alternative. Adult patients experiencing problems obtaining Bivona tubes should talk with their health care professional about using other FDA-cleared tracheostomy tubes, including those made from different materials.

Shuren also said Smiths Medical is communicating with patients about the tubes and ways that patients and caregivers can minimize the shortage's impact, including re-using and cleaning tubes.

The Sterigenics Willowbrook plant sterilized 594 types of devices, including sutures, clamps, knives, stents and needles, according to the FDA. A Viant plant that sterilizes 46 types of devices in Grand Rapids, Mich. will close later this year, the company told area residents last month.

The FDA is not aware of any other shortages due to these closures, and continues to monitor the situation closely, Shuren said. The agency is continuing to update its ethylene oxide in medical device sterilization web page and is working on identifying new methods for medical device sterilization. It will make those findings public in the coming weeks, according to the statement.

"We recognize the very real consequences that medical device shortages have on patients, and we'll continue to work directly with manufacturers, contract sterilizers, government agencies and other public health stakeholders to do all we can to avert new device shortages," Shuren said.

FDA identifies hundreds of devices affected by sterilisation facility closures

FDA has launched a notification system where device manufacturers and users may notify the agency of any shortages or related supply issues stemming from sterilisation facility shutdowns...

European Pharmaceutical Review

12 April 2019

The US Food and Drug Administration (FDA) has identified nearly 600 types of medical devices possibly impacted by the recent shutdown of a sterilisation facility in the midwestern US, and states that a second sterilisation facility will also close this year. According to a recent statement from FDA, 594 types of devices are listed in the agency's Establishment Registration & Device Listing database as undergoing sterilisation at the Sterigenics facility in Illinois. Manufacturers of these devices may need to find alternative sterilisation providers in light of the Sterigenics facility closure, ordered by the Illinois state government due to environmental issues related to the firm's use of ethylene oxide in its sterilisation process.

Device types previously undergoing sterilisation at Sterigenics in Illinois include sutures, knives, needles, clamps and stents.

Challenges stemming from the Sterigenics closure may soon be compounded by the shutdown of another contract steriliser's facility in Michigan, Viant, scheduled for later in 2019 because of similar ethylene oxide-related environmental concerns. FDA has identified 46 additional device types including catheters and surgical meshes that undergo sterilisation at the Viant facility.

US regulators have begun efforts to identify alternative sterilisation facilities for manufacturers affected by the Sterigenics and pending Viant closures. FDA is also recommending that companies consider how these closures could impact their distribution and supply chains as well as patient care.

Following FDA's regulatory-related recommendations for affected manufacturers that need to change contract sterilisation partnerships, the agency has set up a 'device shortages mailbox' to receive notifications of any device supply delays or shortages from manufacturers, patients and users. The regulator may also move to allow availability of affected device types from other sources if necessary.

FDA notes that about half of all devices undergoing sterilisation in order to be legally marketed in the US are sterilised using ethylene oxide. Given the prospect that more facilities using ethylene oxide sterilisation techniques may run afoul of environmental regulators as Sterigenics and Viant have, the agency is collaborating with stakeholders to develop 'new and improved' sterilisation methods.

Specifically, FDA is looking at validating sterilisation methods that use lower levels of ethylene oxide to reduce environmental impact, as well as new sterilisation agents that pose lower environmental risks.

Canadian regulators clarify changes in qualifications for medical device licenses following Sterigenics shutdown

Mass Device

By Danielle Kirsh

12 April 2019

Canadian medical device regulator Health Canada has issued a clarification on which changes to Medical Device License (MDL) holders' sterilization processes constitute "significant changes" following the closure of a major sterilization facility in the US earlier in 2019.

Get the full story here at the [*Emergo Group's blog*](#) [the April 5th blog post can be found below].

Health Canada clarifies "significant change" qualifications to Medical Device Licenses following Sterigenix shutdown

- *Health Canada clarifies which changes in sterilization processes would require Medical Device License amendment applications;*
- *Impact of Sterigenics sterilization facility in the US on MDL holders still being assessed.*

Canadian medical device regulator Health Canada has issued a clarification on which changes to Medical Device License (MDL) holders' sterilization processes constitute "significant changes" following the closure of a major sterilization facility in the US earlier in 2019.

In a recent email to stakeholders, Health Canada followed up on a previous [notice](#) establishing a process whereby MDL holders in need of alternate sterilization providers after the Sterigenics facility shutdown in Illinois could notify the regulator. That notice also pointed out that in some cases, changes in sterilization procedures could require "significant changes" and license amendments.

Sterilization methods and MDL change amendments

In general, Health Canada advises that changes in facilities alone—that is, with no changes to a device, its packaging or method of sterilization—would not warrant a new MDL application submission. The regulator cites its significant change guidance, pointing out the following changes that would require filing amendments to MDLs:

- *Changes that increase bioburden alerts or action levels;*
- *Changes that introduce organisms more resistant to sterilization effects;*
- *Device design and material changes that introduce features more difficult to sterilize;*
- *Changes in sterilization processes, equipment or cycle parameters;*
- *Changes in density or configuration of a sterilization load;*
- *Changes to quality control verification and validation processes.*

Health Canada adds that moving a sterilization process to a new facility may include changes to the sterilization process, equipment and/or cycle parameters; the Sterigenics facility in the US used ethylene oxide sterilization methods, for example, but alternate sterilization sites may not. In such cases, changes in process would qualify as significant changes, according to the regulator.

MDL holders with devices impacted by the Sterigenics shutdown may still [email](#) Health Canada's Regulatory Operations and Enforcement Branch to notify the regulator of any potential supply issues.

Learn more about Health Canada medical device regulations at Emergo by UL:

- *Health Canada MDL and MDEL registration [consulting](#)*
- *CMDCAS, MDSAP and Health Canada ISO 13485 quality system [compliance](#)*
- *Medical device sterilization testing and cleaning validation [support](#)*
- *[Whitepaper](#): Preparing a Canadian MDL application*
- *[Whitepaper](#): Overview of ISO 11135:2014 and medical device sterilization*

Tom Roberts | Partner
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Message

From: Grundler, Christopher [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D3BE58C2CC8545D88CF74F3896D4460F-GRUNDLER, CHRISTOPHER]
Sent: 3/25/2019 2:00:16 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Update: OTAQ and Ethylene Dioxide

Bill—

Deliberative Process / Ex. 5

Thanks, Chris

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (Washington, DC)
734.214.4207 (Ann Arbor, MI)

Message

From: Rakosnik, Delaney [rakosnik.delaney@epa.gov]
Sent: 11/2/2018 2:57:12 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]
CC: Lewis, Josh [Lewis.Josh@epa.gov]; Atkinson, Emily [Atkinson.Emily@epa.gov]
Subject: Sterigenics website

Hi Bill,

Phil MacNabb from Sterigenics wanted to share his public forum with you, per your request. It's how they share information with the public.

<https://www.sterigenicswillowbrook.com/>

Thanks,

Delaney Rakosnik
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

Message

From: Jennifer McConahy [**Personal Address / Ex. 6**]
Sent: 3/21/2019 9:43:41 PM
To: Wheeler, Andrew [wheeler.andrew@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Lewis, Josh [Lewis.Josh@epa.gov]
Subject: Press release
Attachments: Press Release 03 21 19.pdf

https://lookaside.fbsbx.com/file/Press%20Release%2003%2021%2019.pdf?token=AWzKXjTYY7TzwTDdpNr1AstfuHKjN5PSKm16XI9IQFGrNI7NuCMJML7EaVx-N0R8Own8M6FdCXcG4PPacZZaiP4A-4YLaCI7BXngs2JLY0gVCFTLyRRjeh7-q9lyy1hK2B6bsyX_UHZVsQX4lRgzxVZKSByaCG7JeNA84OZKirZyE39jrIU8rHm74JrTJwUgIKA6Iyt3c3ZOLyFMcTdluJB

Message

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 4/9/2019 8:10:44 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: RE: Early version of your calendar for Wednesday plus some materials

Hi Bill – I'll arrange motor pool for you. Thanks!

From: Wehrum, Bill
Sent: Tuesday, April 9, 2019 4:10 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Idsal, Anne <idsal.anne@epa.gov>; Woods, Clint <woods.Clint@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; Harlow, David <harlow.david@epa.gov>; Atkinson, Emily <Atkinson.Emily@epa.gov>; Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: Re: Early version of your calendar for Wednesday plus some materials

Thanks Josh. I will come to the office before going to the hill. I'd appreciate motor pool if that can be arranged.

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

On Apr 9, 2019, at 12:10 PM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

Sending early in case you want any of this while waiting in the airport or for the plane. Couple of notes:
(1) For the 9 am meeting with Senator Ernst, I'm assuming you'll go straight to the Hart building (it's room 730). Tony Frye from OCIR will meet you there. It'll just be the two of you (Ben taking a pass; Anne covering NTOC)
(2) HEI meeting at noon is still on your calendar. There are about 50 people on the invite (many of them OAR). Not sure this is the best use of your time...plus that's pretty much the only time available to talk Uinta with Justin. Leaving you double booked for now and we can figure this out in the morning.

April 2019

<Picture (Device Independent Bitmap) 1.jpg>

<Picture (Device Independent Bitmap) 2.jpg>

Wed, Apr 10

<Picture (Device Independent Bitmap) 3.jpg> All Day

IO Travel Training

<Picture (Device Independent Bitmap) 4.jpg> **Before 8:00 AM**
 <Picture (Device Independent Bitmap) 5.jpg> **8:00 AM – 9:00 AM**
 <Picture (Device Independent Bitmap) 6.jpg> **9:00 AM – 9:30 AM**
 <Picture (Device Independent Bitmap) 7.jpg> **9:00 AM – 10:00 AM**
 <Picture (Device Independent Bitmap) 8.jpg> **9:30 AM – 10:00 AM**
 <Picture (Device Independent Bitmap) 9.jpg> **10:00 AM – 10:45 AM**
 <Picture (Device Independent Bitmap) 10.jpg> **10:45 AM – 11:00 AM**
 <Picture (Device Independent Bitmap) 11.jpg> **11:00 AM – 12:00 PM**
 <Picture (Device Independent Bitmap) 12.jpg> **12:00 PM – 1:00 PM**
 <Picture (Device Independent Bitmap) 13.jpg> **12:00 PM – 1:00 PM**
 <Picture (Device Independent Bitmap) 14.jpg> **1:00 PM – 1:30 PM**
 <Picture (Device Independent Bitmap) 15.jpg> **1:30 PM – 2:30 PM**
 <Picture (Device Independent Bitmap) 16.jpg> **2:30 PM – 3:15 PM**
 <Picture (Device Independent Bitmap) 17.jpg> **3:15 PM – 3:30 PM**
 <Picture (Device Independent Bitmap) 18.jpg> **3:30 PM – 4:00 PM**
 <Picture (Device Independent Bitmap) 19.jpg> **4:00 PM – 4:45 PM**
 <Picture (Device Independent Bitmap) 20.jpg> **4:45 PM – 5:30 PM**
 <Picture (Device Independent Bitmap) 21.jpg> **5:30 PM – 6:00 PM**
 <Picture (Device Independent Bitmap) 22.jpg> **After 6:00 PM**

Free

Free

Deliberative Process / Ex. 5

Free

Call with Phil MacNabb re: Sterigenics

Deliberative Process / Ex. 5

Free

<Picture (Device Independent Bitmap) 23.jpg>

Josh Lewis
 Chief of Staff
 EPA/Office of Air and Radiation
 Office: 202 564 2095

<2019-04-09 Fairbanks Fine PM SIP Planning ORA Briefing - final.docx>

<2019-04-09 Addendum - Background on NRDC v EPA and SIP Deadlines.docx>

<State and Local Issues and SAFE Rulemaking_4-10-19_final.docx>

<dshRLSOONG FIP Amendments Final Rule SAN 5727 4 4 19 (002) cw mk.docx>

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 3/20/2019 3:32:50 PM
To: 'pjb7@cdc.gov' [pjb7@cdc.gov]
CC: 'olx1@cdc.gov' [olx1@cdc.gov]; 'robin.ikeda@cdc.hhs.gov' [robin.ikeda@cdc.hhs.gov]; 'mkj@cdc.gov' [mkj@cdc.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Wheeler, Andrew [wheeler.andrew@epa.gov]
Subject: Willowbrook, IL Sterigenics Ethylene Oxide Sterilization Facility
Attachments: Sterigenics Letter to ATSDR 3 19 19F.pdf

Director Breyse – attached please find a letter from my client, Sterigenics, regarding the recent request from the Illinois Congressional Delegation for ATSDR to conduct an updated Health Consultation for the Sterigenics sterilization facility in Willowbrook, IL.

If you have any questions, please contact me.

Thank you.

Tom Roberts | Partner
VanNess Feldman LLP

1050 Thomas Jefferson Street, NW
Washington, DC 20007

(202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com

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March 20, 2019

Via electronic transmission

Dr. Patrick Breyse
Director
Agency for Toxic Substances and Disease Registry
4770 Buford Highway NE
Atlanta, GA 30341

Dear Director Breyse:

We are aware of the request from members of the Illinois Congressional Delegation for the Agency for Toxic Substances and Disease Registry (ATSDR) to conduct an updated site-specific Health Consultation for Willowbrook, Illinois based on recent ambient air measurements of ethylene oxide (EO). The Health Consultation released last year unnecessarily caused fears among residents in the Village of Willowbrook and has resulted in serious negative consequences for the patients who rely on the critical medical products and devices sterilized at our Willowbrook facility, not to mention our customers.

We believe that a new Health Consultation is inappropriate at this time. As you are no doubt aware, the U.S. Environmental Protection Agency (U.S. EPA) is in the process of conducting its own risk assessment in Willowbrook. In our view, any Health Consultation prior to the completion of the U.S. EPA's work would be premature, and would produce interim characterizations that would add little to the understanding of actual long-term health risks for the people in and around Willowbrook.

If the decision is made to proceed with an updated Health Consultation, we request that the ATSDR adhere to these two fundamental principles:

1. The updated analysis should be conducted only after all of the information necessary to support a credible result is collected, checked for quality control purposes and thoroughly analyzed. The analysis should not be based on incomplete or partial data or limited scope of analysis.
2. The intended use, applicability and limitations of this analysis must be spelled out clearly and unequivocally.

In addition, as the ATSDR evaluates the Congressional request, we believe it is critical to carefully consider the validity of the assertion that air quality levels have worsened in Willowbrook after Sterigenics' voluntary installation of emission control upgrades in July 2018. We believe that assertion is, at best, misleading for the following reasons:

1. **EO Levels in Ambient Air Are Below Levels Used by ATSDR.** Based on the U.S. EPA's test results released to date, the residential average detection level for EO is 0.71 ug/m³ and the commercial average is 3.60 ug/m³. Despite inconsistent and inexplicable detection levels at certain locations on various days, the respective averages remain well below the levels selected

by ATSDR as samples for its analysis, i.e., a residential sample of 2.1 ug/m³ and the commercial sample of 9.1 ug/m³.

2. **Emissions Testing at the Willowbrook Facility Demonstrates Effectiveness of EO Controls.** Testing results conducted in September 2018 by a third party and witnessed by representatives from the IL EPA, U.S. EPA, Tri-State Fire Department and the Village of Willowbrook confirmed emissions control efficiencies at Sterigenics' Willowbrook facility of over 99.5% - above the 99% control level required.
3. **Sterigenics is not the Only EO Source in Willowbrook.** As the U.S. EPA indicated on February 5, and reiterated on March 7, there are other sources of EO in Willowbrook aside from Sterigenics.

In point of fact, the emissions control systems at the Sterigenics Willowbrook facility enable the company to outperform the regulatory requirements, but we cannot control the level of EO already in the environment from other sources.

Additionally, we respectfully request that any new evaluation conducted by the ATSDR involve a comprehensive and thorough analysis including the following:

- The study scope and protocol should be published in advance of ATSDR's report to facilitate transparency.
- Consistent with other risk assessments done by the ATSDR, facility modeling of emissions should be used to drive the risk assessment. This is the best current method to hold facilities accountable for their own emissions.
- Testing and modeling should follow the latest improvements to facility emissions controls, so the evaluation addresses present potential risk rather than using speculative methods to assess historic presumed conditions.
- Any inclusion of ambient air samples should consider the following:
 - All samples must have undergone quality assurance processes to ensure that they are accurate measurements of solely EO and meet the requisite protocols;
 - Averages of all valid samples should be utilized and not solely the highest samples which would create an unrealistic scenario, especially if sampled measurements are then assumed to model continuous exposures over multiple years or decades;
- The study should take into account the background levels of EO, including the national review of background levels currently underway by the U.S. EPA, and should not assume that Sterigenics is the source of all measured EO in Willowbrook;
- When evaluating EO concentrations in Willowbrook against the IRIS EO risk assessment, the study must account for the fact that the IRIS inhalation unit risk values are unrealistically conservative in view of proven levels of background EO in the Chicago area and other geographic areas across the United States;
- Finally, the report should be peer reviewed and the results should be put in the proper context with respect to communicating reasonable estimates of long-term health risk to the public.

Inaccurate and misleading information regarding the Sterigenics Willowbrook facility and the safe use of EO has had serious negative consequences. Among other things, the failure to



realistically assess population health risks and communicate them in contextually appropriate ways has resulted in the shutdown of the Sterigenics Willowbrook facility despite its compliance with all permits and regulations. Make no mistake; the shutdown is placing at risk the patients

who rely on the facility to sterilize vital medical products. Beyond that, the residents of Willowbrook have been subjected to months of worry.

Establishing sound public policy relies upon complete and balanced analytics and transparency regarding the facts. In keeping with our commitment to working with officials in support of evolving regulations, we are prepared to meet with you or your colleagues with the goal of providing the facts to reassure the public that our facility operates safely. Please do not hesitate to contact me to schedule such a meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip Macnabb".

Philip Macnabb
President, Sterigenics

Cc: Robert R. Redfield, MD, Director, Centers for Disease Control and Protection
Robin M. Ikeda, MD, MPH, Deputy Director for Non-Infectious Diseases, Centers for Disease Control and Protection
Mark Johnson, Ph.D., Regional Director, ATSDR Region 5
Andrew Wheeler, Administrator, United States Environmental Protection Agency
Bill Wehrum, Assistant Administrator for the Office of Air and Radiation, United States Environmental Protection Agency

Message

From: Lewis, Josh [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22D1D3BB3F84436A524F76AB6C79D7E-JOLEWIS]
Sent: 4/8/2019 6:26:21 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: RE: Couple of things

Got it. We'll make the change

From: Wehrum, Bill
Sent: Monday, April 08, 2019 1:34 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Re: Couple of things

Deliberative Process / Ex. 5

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

On Apr 8, 2019, at 8:20 AM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

Deliberative Process / Ex. 5

From: Wehrum, Bill
Sent: Monday, April 08, 2019 7:13 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Re: Couple of things

Here are my edits:

Deliberative Process / Ex. 5

I'm okay with the letter with those edits. You can autopen if needed.

Thanks.

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

On Apr 6, 2019, at 7:46 AM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

Deliberative Process / Ex. 5

Mike and Deborah are in DC next week, so that's why Alexis will be the one welcoming you to R9.

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
Sent: 3/14/2019 4:49:42 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Millett, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c067caa6c93544f78c26ab08cc567d27-Millett, John]
Subject: RE: Bill's calendar 2/18-3/1

Great – thanks for taking a look.

From: Wehrum, Bill
Sent: Thursday, March 14, 2019 12:06 PM
To: DeLuca, Isabel <DeLuca.Isabel@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>; Millett, John <Millett.John@epa.gov>
Subject: RE: Bill's calendar 2/18-3/1

Looks fine. Thanks.

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

From: DeLuca, Isabel
Sent: Thursday, March 14, 2019 9:54 AM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>; Millett, John <Millett.John@epa.gov>
Subject: Bill's calendar 2/18-3/1

Hi Bill,
Reflagging your calendar from 2/18-3/1. If you have any corrections or questions please let me know. If this looks correct, I'll go ahead and send up for posting.

Thanks,
Isabel

2/18/2019	No scheduled meetings	
2/19/2019 9:15AM	Staff briefings	EPA Headquarters
2/19/2019 1:00PM	Call with Sterigenics	EPA Headquarters
2/19/2019 2:00PM	Staff briefings	EPA Headquarters
2/19/2019 6:00PM	Interagency meeting	The White House
2/20/2019 9:45AM	Staff briefings	EPA Headquarters
2/20/2019 2:00PM	Media Interview	EPA Headquarters
2/20/2019 2:30PM	Staff briefings	EPA Headquarters

2/21/2019	8:30AM	Staff briefings	EPA Headquarters
2/21/2019	11:00AM	Meeting with the Heartland Institute	EPA Headquarters
2/21/2019	11:30AM	Staff briefing	EPA Headquarters
2/21/2019	1:00PM	Meeting with Growth Energy	EPA Headquarters
2/21/2019	2:00PM	EPA Webinar: Update on Ethylene Oxide Monitoring in Willowbrook, Illinois	EPA Headquarters
2/21/2019	3:00PM	Staff briefings	EPA Headquarters
2/21/2019	5:30PM	Stakeholder conference call on fuel economy	EPA Headquarters
2/22/2019	9:30AM	Staff briefing	EPA Headquarters
2/22/2019	10:15AM	Meeting with Renewable Fuels Association	EPA Headquarters
2/22/2019	11:00AM	Staff briefings	EPA Headquarters
2/25/2019	9:30AM	Staff briefings	EPA Headquarters
2/25/2019	1:15PM	Meeting with South Coast Air Quality Management District	EPA Headquarters
2/25/2019	2:00PM	Staff briefings	EPA Headquarters
2/25/2019	4:00PM	Call with Sterigenics	EPA Headquarters
2/26/2019		Staff briefings at EPA's Research Triangle Park offices	Research Triangle Park, N
2/27/2019	9:15AM	Staff briefings	EPA Headquarters
2/28/2019		Staff briefings at EPA's Ann Arbor lab	Ann Arbor, MI
3/1/2019	8:30AM	Staff briefings	EPA Headquarters
3/1/2019	11:00AM	Meeting with Occidental Petroleum Corporation	EPA Headquarters
3/1/2019	2:30PM	Call with Maine Forestry Stakeholders	EPA Headquarters
3/1/2019	3:30PM	Staff briefings	EPA Headquarters

Isabel DeLuca
 Office of Air and Radiation, US EPA
 (202) 343-9247

Message

From: Lewis, Josh [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22D1D3BB3F84436A524F76AB6C79D7E-JOLEWIS]
Sent: 3/14/2019 4:23:39 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: RE: For Review: Draft EtO Response 3-6-19.docx

Thanks. I'll have OAQPS start processing

From: Wehrum, Bill
Sent: Thursday, March 14, 2019 12:09 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>; Woods, Clint <woods.clint@epa.gov>
Subject: RE: For Review: Draft EtO Response 3-6-19.docx

Still looks good to me. Thanks.

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

From: Lewis, Josh
Sent: Thursday, March 14, 2019 10:35 AM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Woods, Clint <woods.clint@epa.gov>
Subject: For Review: Draft EtO Response 3-6-19.docx

Bill – gave you a copy of this last week.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

From: Noonan, Jenny
Sent: Wednesday, March 06, 2019 8:04 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Davis, Alison <Davis.Alison@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>; Long, Pam <Long.Pam@epa.gov>
Subject: Draft EtO Response 3-6-19.docx

Hi Josh –

We've got some IL citizen letters expressing concerns about EtO emissions from Sterigenics in Willowbrook. Since

Deliberative Process / Ex. 5

Thanks,

Jenny

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 3/12/2019 1:23:47 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: Do you need anything else on this?
Attachments: 19.02.15 - Letter to EPA Air Radiation Division re EtO Air Monitoring in Lake Co.pdf; ATT00001.htm; 18.10.17 0 19-000-0435.pdf; ATT00002.htm; 19.01.29- Duckworth et al to EPA opposing RTR on HCL that undermines ETO risk assessment.pdf; ATT00003.htm; 19.02.13 - IL delegation to Wheeler on Sterigenics national background study.pdf; ATT00004.htm; Meeting with Senator Durbin.updated 3.11.19.v2.docx; ATT00005.htm

Begin forwarded message:

From: "Davis, Alison" <Davis.Alison@epa.gov>
To: "Woods, Clint" <woods.clint@epa.gov>
Subject: Do you need anything else on this?

Deliberative Process / Ex. 5

From: Davis, Alison
Sent: Monday, March 11, 2019 11:49 AM
To: Woods, Clint <woods.Clint@epa.gov>
Subject: RESENDING FW: Meeting with Senator Durbin.updated 3.11.19.v2.docx

Removing "Updating" from the header. Please use this version. Thanks.

From: Davis, Alison
Sent: Monday, March 11, 2019 11:46 AM
To: Woods, Clint <woods.Clint@epa.gov>
Subject: Meeting with Senator Durbin.updated 3.11.19.v2.docx

Hi Clint,
Here you go. R5 provided info on Lake County.
This also references several letters from the Senator on EtO, and says they are attached. They are included here.
-Alison

Appointment

From: Idsal, Anne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B1BECA8121FB47A08E82B6BF2247A79B-IDSAL, ANNE]
Sent: 6/24/2019 3:49:28 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 **Personal Phone / Ex. 6**
Start: 6/28/2019 3:30:00 PM
End: 6/28/2019 4:00:00 PM
Recurrence: (none)

Appointment

From: Lewis, Josh [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22D1D3BB3F84436A524F76AB6C79D7E-JOLEWIS]
Sent: 6/24/2019 3:47:47 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 **Personal Phone / Ex. 6**
Start: 6/28/2019 3:30:00 PM
End: 6/28/2019 4:00:00 PM
Show Time As: Busy

Appointment

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 2/25/2019 8:56:24 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6
Start: 2/25/2019 9:00:00 PM
End: 2/25/2019 9:30:00 PM
Show Time As: Busy

Appointment

From: Nam, Ed [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A2653F1DDD59470688BA557DD84D9690-NAM, ED]
Sent: 2/22/2019 7:37:28 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Region 5 re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM
Show Time As: Busy

Appointment

From: Williams, Felicia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6527F339DDB0443C8FA6188E5038057D-FWILLI02]
Sent: 2/22/2019 4:45:23 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Region 5 re: Sterigenics
Location: WJC - N + Personal Phone / Ex. 6
Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM
Show Time As: Busy

Appointment

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 2/5/2019 4:38:51 AM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Phone call with Phil MacNAbb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 2/4/2019 4:30:00 PM
End: 2/4/2019 5:00:00 PM
Show Time As: Busy

Appointment

From: Lewis, Josh [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22D1D3BB3F84436A524F76AB6C79D7E-JOLEWIS]
Sent: 12/4/2018 8:18:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 **Personal Phone / Ex. 6**
Start: 12/10/2018 10:00:00 PM
End: 12/10/2018 10:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 12/3/2018 5:09:00 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 12/3/2018 10:00:00 PM
End: 12/3/2018 10:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 11/26/2018 3:02:47 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Phil McNabb re: Sterigenics

Location: **Personal Phone / Ex. 6**

Start: 11/26/2018 9:30:00 PM
End: 11/26/2018 10:00:00 PM
Show Time As: Busy

Appointment

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 12/14/2018 12:19:30 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: FW: Conference call with Willowbrook citizen Jennifer McConaghy re: Sterigenics facility
Location: WJC - N 5400 + conference call
Start: 12/13/2018 5:30:00 PM
End: 12/13/2018 6:00:00 PM
Show Time As: Busy

Appointment

From: Jacks, Susan [Jacks.Susan@epa.gov]
Sent: 5/29/2019 1:36:57 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]

Subject: Accepted: Sterigenics Willowbrook Facility: Open House & Community Meeting
Location: Marriott Chicago Southwest at Burr Ridge, IL

Start: 5/29/2019 8:00:00 PM
End: 5/30/2019 3:00:00 AM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 11/8/2018 6:31:37 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: HOLD || Meeting with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 { **Personal Phone / Ex. 6** }
Start: 11/13/2018 2:30:00 PM
End: 11/13/2018 3:15:00 PM
Show Time As: Busy

Appointment

From: Idsal, Anne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B1BECA8121FB47A08E82B6BF2247A79B-IDSAL, ANNE]
Sent: 5/16/2019 3:24:21 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 Personal Phone / Ex. 6
Start: 5/16/2019 3:30:00 PM
End: 5/16/2019 4:00:00 PM

Recurrence: (none)

Appointment

From: Lewis, Josh [Lewis.Josh@epa.gov]
Sent: 3/25/2019 7:16:14 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]

Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400

Start: 3/25/2019 7:30:00 PM
End: 3/25/2019 8:15:00 PM
Show Time As: Busy

Appointment

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 4/22/2019 7:04:59 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Phone / Ex. 6**
Start: 4/22/2019 8:00:00 PM
End: 4/22/2019 8:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDED-RAKOSNIK, D]
Sent: 3/18/2019 8:00:37 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6
Start: 3/18/2019 8:00:00 PM
End: 3/18/2019 8:30:00 PM
Show Time As: Busy

Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 2/16/2019 12:16:44 AM
To: Macnabb, Philip [PMacnabb@sterigenics.com]
CC: tcr@vnf.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=60634a7f78964380838648935cd3d7b1-tcr@vnf.com]
Subject: Re: IL EPA

Phil - Thanks for letting us know.

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

> On Feb 15, 2019, at 7:12 PM, Macnabb, Philip <PMacnabb@sterigenics.com> wrote:
>
> Bill
>
> I wanted to make you aware that tonight at 5pm we received a "seal order" from IL EPA to stop using EO due to public health crisis. We will stop processing until we can get in front of a judge.
>
> Feel free to call my cell at Personal Phone / Ex. 6 if you would like further details.
>
> Sent from my iPhone
> This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 3/4/2019 9:35:21 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Block, Molly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=60d0c681a16441a0b4fa16aa2dd4b9c5-Block, Moll]; Dunn, Alexandra [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=426d0177eaab4001a5c85f051565997e-Dunn, Alexa]
Subject: RE: TRI Follow-up

Thanks Nancy.

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

From: Beck, Nancy
Sent: Monday, March 4, 2019 4:33 PM
To: Woods, Clint <woods.clint@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>
Cc: Block, Molly <block.molly@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>
Subject: TRI Follow-up

Regarding EO a table of release information is below. In 2016 total releases were 336K pounds. In 2017, total releases were 242K pounds, a 28% reduction from 2016.

We also have an internal QA:

Deliberative Process / Ex. 5

Our understanding is that region 5 is working with us to develop more questions.
Please let us know if you need more information.

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Detail columns are collapsed by default. Click the icon to view additional columns. Use your Browser back feature to collapse.

Data Source: 2017 Dataset (released October 2018)

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TRI On-site and Off-site Reported Disposed of or Otherwise Released (in pounds), for All industries, for ETHYLENE OXIDE chemical, U.S., 2017

Row #	Chemical	Fugitive Emissions	Source Air Emissions	Surface Water Discharges	Underground Injection Class B-V Wells	Land Treatment	RCRA Subtitle C Surface Impoundments	Other Surface Impoundments	Other Land Disposal	Sub Total	Total On-site Disposal or Other Releases	Total Off-site Disposal or Other Releases	Total On-site and Off-site Disposal or Other Releases
1	ETHYLENE OXIDE	62,829	177,262	2,285	0	2	0	0	0	3,242,382	242,382	124	242,506
	Total	62,829	177,262	2,285	0	2	0	0	0	3,242,382	242,382	124	242,506

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Transfers Off-site for Further Waste Management

Quantities of TRI Chemicals in Waste (waste management)

From: Beck, Nancy

Sent: Monday, March 4, 2019 3:14 PM

To: Reisman, Larry <Reisman.Larry@epa.gov>; Altieri, Sonia <Altieri.Sonia@epa.gov>

Cc: Hanley, Mary <Hanley.Mary@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>

Subject: TRI

Importance: High

Larry/ Sonia

Before release OAR would like to see the Ethylene oxide release information and also anything relevant to the region 5 facility

Can you send me what we have ASAP. I know I saw a draft internal QA. If you could bundle that with release information that would be great.

Thanks,
Nancy

Nancy B. Beck, Ph.D., DABT

ED_002192D_00275885-00002

Principal Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention
P: 202-564-1273
beck.nancy@epa.gov

Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 3/4/2019 12:19:39 AM
To: Lewis, Josh [Lewis.Josh@epa.gov]; Woods, Clint [woods.clint@epa.gov]
Subject: Fwd: Sterigenics shutdown

FYI

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

Begin forwarded message:

From: Anna McCormick <[REDACTED]> **Personal Address / Ex. 6**
Date: March 3, 2019 at 6:07:43 PM EST
To: wehrum.william@epa.gov
Subject: Sterigenics shutdown

Hi Mr. Wehrum,
My name is Anna McCormick and I am a reporter for the Lyons Township High School newspaper. I am beginning to write an article on the shutdown of Sterigenics and I was wondering if you would be willing to answer a few questions via phone or email. Thank you for your time.
Sincerely,
Anna McCormick

Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 2/14/2019 1:16:32 AM
To: Rakosnik, Delaney [rakosnik.delaney@epa.gov]
Subject: Fwd: Quick call

Delaney - Will you please squeeze this in the tomorrow? Thanks.

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

Begin forwarded message:

From: "Macnabb, Philip" <PMacnabb@sterigenics.com>
Date: February 13, 2019 at 6:41:41 PM EST
To: "Wehrum.Bill@epa.gov" <Wehrum.Bill@epa.gov>
Subject: Quick call

Bill

Let me know if you have a few minutes tonight or tomorrow for a brief call. I want to give you a heads up on a path we are pursuing this fr

Sent from my iPhone

This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.